Addendum No. 1

Laboratory analysis results of samples collected at Commercial Metals Company, Corpus Christi, TX, on March 24, 2003, and analyzed by the U.S. EPA Region 6 Environmental Services Branch Laboratory, Houston. Document was received from Lou Roberts on October 22, 2003.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region 6 Environmental Services Branch Laboratory
10625 Fallstone Road, Houston, TX 77099
Phone: (281)983-2100 Fax: (281)983-2248

Final Analytical Report

Site Name ---------- Commercial Metals - Corpus Christi

Sample Collection Date(s)-- 03/24/03

Contact ---------- Lou Roberts (6EN-AT)

Report Date ---------- 06/13/03

Work Order(s) ---------- 0303049

Analyses included in this report:

PCB 8082	Solids, Dry Weight

Report Narrative

The samples were analyzed 54 to 55 days after extraction. The recommended hold time for Method 8082 is 40 days.

The reporting limit (RL) for Aroclor 1260 was raised on sample 0303049-04 due to matrix interferences. Absence or presence at the lower RL could not be verified.

Standard procedures for quality assurance and quality control were followed in the analysis and reporting of the sample results. The results apply only to the samples tested. This final report should only be reproduced in full.

Reporting limits are adjusted for sample size and matrix interference.

Report Approval: Richard McMillin

Richard McMillin
Region 6 Laboratory Manager

Environmental Protection Agency

Region 6 Laboratory

10625 Fallstone Road, Houston, TX 77099
Phone:(281)983-2100 Fax:(281)983-2248

ANALYTICAL REPORT FOR SAMPLES

Station ID	Laboratory ID	Matrix	Date Collected	Date Received
1	0303049-01	Solid	03/24/03	03/27/03 10:22
2	0303049-02	Solid	03/24/03	03/27/03 10:22
3	0303049-03	Solid	03/24/03	03/27/03 10:22
4	0303049-04	Solid	03/24/03	03/27/03 10:22
5	0303049-05	Solid	03/24/03	03/27/03 10:22
6	0303049-06	Solid	03/24/03	03/27/03 10:22
7	0303049-07	Solid	03/24/03	03/27/03 10:22
8	0303049-08	Solid	03/24/03	03/27/03 10:22

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Aroclors by EPA Method 8082 - GC/ECD

Lab ID: 0303049-01 **Station ID: 1**

Batch: B3D0404 Date Collected: 03/24/03
Matrix: Solid Sample Volume: 1.134g Sample Qualifiers:

Analyte	Result µg/kg dry	Analyte Qualifiers	Reporting Limit	Dilution	Prepared	Analyzed
Aroclor-1016	U		394	1	04/03/03	05/27/03
Aroclor-1221	U		788	"	"	"
Aroclor-1232	U		394	"	"	"
Aroclor-1242	**3760**		394	"	"	"
Aroclor-1248	U		394	"	"	"
Aroclor-1254	**1830**		394	"	"	"
Aroclor-1260	**1170**		394	"	"	"

Analyte	Result µg/kg dry	Analyte Qualifiers	%Recovery	%Recovery Limits	Prepared	Analyzed
Surr: Tetrachloro-meta-xylene	3020		61.3	11-113	"	"
Surr: Decachlorobiphenyl	3420		69.4	35-138	"	"
% Solids	**89.5**			1	03/31/03	04/01/03

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Aroclors by EPA Method 8082 - GC/ECD

Lab ID: 0303049-02 **Station ID: 2**

Batch:B3D0404 Date Collected: 03/24/03
Matrix: Solid Sample Volume: 1.159g Sample Qualifiers:

Analyte	Result µg/kg dry	Analyte Qualifiers	Reporting Limit	Dilution	Prepared	Analyzed
Aroclor-1016	U		404	1	04/03/03	05/27/03
Aroclor-1221	U		808	"	"	"
Aroclor-1232	U		404	"	"	"
Aroclor-1242	**46500**		4040	10	"	05/28/03
Aroclor-1248	U		404	1	"	05/27/03
Aroclor-1254	**1510**		404	"	"	"
Aroclor-1260	**723**		404	"	"	"

Analyte	Result µg/kg dry	Analyte Qualifiers	%Recovery	%Recovery Limits	Prepared	Analyzed
Surr: Tetrachloro-meta-xylene	2970		58.8	11-113	"	"
Surr: Decachlorobiphenyl	3780		74.9	35-138	"	"
% Solids	**85.4**			1	03/31/03	04/01/03

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Aroclors by EPA Method 8082 - GC/ECD

Lab ID: 0303049-03 **Station ID: 3**

Batch: B3D0404
Matrix: Solid
Date Collected: 03/24/03
Sample Volume: 2.305g
Sample Qualifiers:

Analyte	Result µg/kg dry	Analyte Qualifiers	Reporting Limit	Dilution	Prepared	Analyzed
Aroclor-1016	U		211	1	04/03/03	05/27/03
Aroclor-1221	U		421	"	"	05/27/03
Aroclor-1232	U		211	"	"	"
Aroclor-1242	**12700**		1260	6	"	05/27/03
Aroclor-1248	U		211	1	"	05/27/03
Aroclor-1254	**19700**		1260	6	"	05/27/03
Aroclor-1260	**4540**		1260	"	"	"

Analyte	Result µg/kg dry	Analyte Qualifiers	%Recovery	%Recovery Limits	Prepared	Analyzed
Surr: Tetrachloro-meta-xylene	2680		102	11-113	"	"
Surr: Decachlorobiphenyl	2380		90.5	35-138	"	"
% Solids	**82.4**			1	03/31/03	04/01/03

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Aroclors by EPA Method 8082 - GC/ECD

Lab ID: 0303049-04 **Station ID: 4**

Batch: B3D0404
Matrix: Solid
Date Collected: 03/24/03
Sample Volume: 2.148g
Sample Qualifiers:

Analyte	Result µg/kg dry	Analyte Qualifiers	Reporting Limit	Dilution	Prepared	Analyzed
Aroclor-1016	U		208	1	04/03/03	05/27/03
Aroclor-1221	U		417	"	"	"
Aroclor-1232	U		208	"	"	"
Aroclor-1242	**1640**		208	"	"	"
Aroclor-1248	U		208	"	"	"
Aroclor-1254	U		208	"	"	"
Aroclor-1260	U		573	"	"	"

Analyte	Result µg/kg dry	Analyte Qualifiers	%Recovery	%Recovery Limits	Prepared	Analyzed
Surr: Tetrachloro-meta-xylene	2100		80.8	11-113	"	"
Surr: Decachlorobiphenyl	2030		78.1	35-138	"	"
% Solids	**89.4**			1	03/31/03	04/01/03

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Aroclors by EPA Method 8082 - GC/ECD

Lab ID: 0303049-05 **Station ID: 5**

Batch: B3D0404
Matrix: Solid
Date Collected: 03/24/03
Sample Volume: 1.42g
Sample Qualifiers:

Analyte	Result µg/kg dry	Analyte Qualifiers	Reporting Limit	Dilution	Prepared	Analyzed
Aroclor-1016	U		316	1	04/03/03	05/27/03
Aroclor-1221	U		631	"	"	05/27/03
Aroclor-1232	U		316	"	"	"
Aroclor-1242	**22700**		3160	10	"	05/27/03
Aroclor-1248	U		316	1	"	05/27/03
Aroclor-1254	**5830**		3160	10	"	05/27/03
Aroclor-1260	**1130**		316	1	"	05/27/03

Analyte	Result µg/kg dry	Analyte Qualifiers	%Recovery	%Recovery Limits	Prepared	Analyzed
Surr: Tetrachloro-meta-xylene	2830		71.6	11-113	"	"
Surr: Decachlorobiphenyl	3020		76.5	35-138	"	"
% Solids	**89.2**			1	03/31/03	04/01/03

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Aroclors by EPA Method 8082 - GC/ECD

Lab ID: 0303049-06 **Station ID: 6**

Batch: B3D0404 Date Collected: 03/24/03
Matrix: Solid Sample Volume: 1.27g Sample Qualifiers:

Analyte	Result µg/kg dry	Analyte Qualifiers	Reporting Limit	Dilution	Prepared	Analyzed
Aroclor-1016	U		348	1	04/03/03	05/27/03
Aroclor-1221	U		696	"	"	05/27/03
Aroclor-1232	U		348	"	"	"
Aroclor-1242	**46700**		3480	10	"	05/27/03
Aroclor-1248	U		348	1	"	05/27/03
Aroclor-1254	U		348	"	"	"
Aroclor-1260	**1240**		348	"	"	"

Analyte	Result µg/kg dry	Analyte Qualifiers	%Recovery	%Recovery Limits	Prepared	Analyzed
Surr: Tetrachloro-meta-xylene	3830		88.0	11-113	"	"
Surr: Decachlorobiphenyl	3430		78.9	35-138	"	"
% Solids	**90.4**			1	03/31/03	04/01/03

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Aroclors by EPA Method 8082 - GC/ECD

Lab ID: 0303049-07 **Station ID: 7**

Batch:B3D0404 Date Collected: 03/24/03
Matrix: Solid Sample Volume: 2.225g Sample Qualifiers:

Analyte	Result µg/kg dry	Analyte Qualifiers	Reporting Limit	Dilution	Prepared	Analyzed
Aroclor-1016	U		195	1	04/03/03	05/27/03
Aroclor-1221	U		390	"	"	"
Aroclor-1232	U		195	"	"	"
Aroclor-1242	**1190**		779	4	"	05/28/03
Aroclor-1248	U		195	1	"	05/27/03
Aroclor-1254	**1530**		195	"	"	"
Aroclor-1260	**836**		195	"	"	"

Analyte	Result µg/kg dry	Analyte Qualifiers	%Recovery	%Recovery Limits	Prepared	Analyzed
Surr: Tetrachloro-meta-xylene	1920		78.7	11-113	"	"
Surr: Decachlorobiphenyl	2220		91.0	35-138	"	"
% Solids	**92.3**			1	03/31/03	04/01/03

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Aroclors by EPA Method 8082 - GC/ECD

Lab ID: 0303049-08 **Station ID: 8**

Batch: B3D0404 Date Collected: 03/24/03
Matrix: Solid Sample Volume: 2.142g Sample Qualifiers:

Analyte	Result µg/kg dry	Analyte Qualifiers	Reporting Limit	Dilution	Prepared	Analyzed
Aroclor-1016	U		208	1	04/03/03	05/27/03
Aroclor-1221	U		417	"	"	"
Aroclor-1232	U		208	"	"	"
Aroclor-1242	**5870**		417	2	"	05/28/03
Aroclor-1248	U		208	1	"	05/27/03
Aroclor-1254	**2590**		208	"	"	"
Aroclor-1260	**1670**		208	"	"	"

Analyte	Result µg/kg dry	Analyte Qualifiers	%Recovery	%Recovery Limits	Prepared	Analyzed
Surr: Tetrachloro-meta-xylene	1780		68.5	11-113	"	"
Surr: Decachlorobiphenyl	1990		76.5	35-138	"	"
% Solids	**89.6**			1	03/31/03	04/01/03

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Aroclors by EPA Method 8082 - GC/ECD - Quality Control

Batch: B3D0404

Blank (B3D0404-BLK1)

Prepared: 04/03/03 Analyzed: 05/27/03

ANALYTE	Result µg/kg dry	Analyte Qualifiers	Reporting Limit	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit
Aroclor-1016	U		78.0						
Aroclor-1221	U		156						
Aroclor-1232	U		78.0						
Aroclor-1242	U		78.0						
Aroclor-1248	U		78.0						
Aroclor-1254	U		78.0						
Aroclor-1260	U		78.0						

ANALYTE	Result µg/kg dry	Analyte Qualifiers	Spike Level	%REC	%REC Limits
Surr: Tetrachloro-meta-xylene	1190		975	122 #	11-113
Surr: Decachlorobiphenyl	1250		975	128	35-138

LCS (B3D0404-BS1)

Prepared: 04/03/03 Analyzed: 05/27/03

ANALYTE	Result µg/kg dry	Analyte Qualifiers	Reporting Limit	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit
Aroclor-1242	1990		156	1950		102	70-130		

ANALYTE	Result µg/kg dry	Analyte Qualifiers	Spike Level	%REC	%REC Limits
Surr: Tetrachloro-meta-xylene	871		975	89.3	11-113
Surr: Decachlorobiphenyl	969		975	99.4	35-138

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Aroclors by EPA Method 8082 - GC/ECD - Quality Control

Batch: B3D0404

Matrix Spike (B3D0404-MS1)

Source: 0303049-07 Prepared: 04/03/03 Analyzed: 05/28/03

ANALYTE	Result µg/kg dry	Analyte Qualifiers	Reporting Limit	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit
Aroclor-1242	3780		780	4870	1190	53.2	50-150		

ANALYTE	Result µg/kg dry	Analyte Qualifiers	Spike Level	%REC	%REC Limits
Surr: Tetrachloro-meta-xylene	1350		2440	55.3	11-113
Surr: Decachlorobiphenyl	1910		2440	78.3	35-138

Matrix Spike Dup (B3D0404-MSD1)

Source: 0303049-07 Prepared: 04/03/03 Analyzed: 05/28/03

ANALYTE	Result µg/kg dry	Analyte Qualifiers	Reporting Limit	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit
Aroclor-1242	4510		832	5200	1190	63.8	50-150	18.1	25

ANALYTE	Result µg/kg dry	Analyte Qualifiers	Spike Level	%REC	%REC Limits
Surr: Tetrachloro-meta-xylene	1400		2600	53.8	11-113
Surr: Decachlorobiphenyl	1840		2600	70.8	35-138

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Final Analytical Report

Site Name ---------- Commercial Metals - Corpus Christi

Sample Collection Date(s)-- 03/24/03

Contact ---------- Lou Roberts (6EN-AT)

Report Date ---------- 06/13/03

Work Order(s) ---------- 0303049

Analyses included in this report:

PCB 8082	Solids, Dry Weight

Report Narrative

The samples were analyzed 54 to 55 days after extraction. The recommended hold time for Method 8082 is 40 days.

The reporting limit (RL) for Aroclor 1260 was raised on sample 0303049-04 due to matrix interferences. Absence or presence at the lower RL could not be verified.

Standard procedures for quality assurance and quality control were followed in the analysis and reporting of the sample results. The results apply only to the samples tested. This final report should only be reproduced in full.

Reporting limits are adjusted for sample size and matrix interference.

Report Approval: Richard McMillin

Richard McMillin
Region 6 Laboratory Manager

Environmental Protection Agency

Region 6 Laboratory

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ANALYTICAL REPORT FOR SAMPLES

Station ID	Laboratory ID	Matrix	Date Collected	Date Received
1	0303049-01	Solid	03/24/03	03/27/03 10:22
2	0303049-02	Solid	03/24/03	03/27/03 10:22
3	0303049-03	Solid	03/24/03	03/27/03 10:22
4	0303049-04	Solid	03/24/03	03/27/03 10:22
5	0303049-05	Solid	03/24/03	03/27/03 10:22
6	0303049-06	Solid	03/24/03	03/27/03 10:22
7	0303049-07	Solid	03/24/03	03/27/03 10:22
8	0303049-08	Solid	03/24/03	03/27/03 10:22

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Aroclors by EPA Method 8082 - GC/ECD

Lab ID: 0303049-01 **Station ID: 1**

Batch:B3D0404 Date Collected: 03/24/03
Matrix: Solid Sample Volume: 1.134g Sample Qualifiers:

Analyte	Result µg/kg dry	Analyte Qualifiers	Reporting Limit	Dilution	Prepared	Analyzed
Aroclor-1016	U		394	1	04/03/03	05/27/03
Aroclor-1221	U		788	"	"	"
Aroclor-1232	U		394	"	"	"
Aroclor-1242	**3760**	6760 ug/kg	394	"	"	"
Aroclor-1248	U		394	"	"	"
Aroclor-1254	**1830**		394	"	"	"
Aroclor-1260	**1170**		394	"	"	"

Analyte	Result µg/kg dry	Analyte Qualifiers	%Recovery	%Recovery Limits	Prepared	Analyzed
Surr: Tetrachloro-meta-xylene	3020		61.3	11-113	"	"
Surr: Decachlorobiphenyl	3420		69.4	35-138	"	"
% Solids	**89.5**			1	03/31/03	04/01/03

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Aroclors by EPA Method 8082 - GC/ECD

Lab ID: 0303049-02 **Station ID: 2**

Batch:B3D0404 Date Collected: 03/24/03
Matrix: Solid Sample Volume: 1.159g Sample Qualifiers:

Analyte	Result µg/kg dry	Analyte Qualifiers	Reporting Limit	Dilution	Prepared	Analyzed
Aroclor-1016	U		404	1	04/03/03	05/27/03
Aroclor-1221	U		808	"	"	"
Aroclor-1232	U		404	"	"	"
Aroclor-1242	**46500**		4040	10	"	05/28/03
Aroclor-1248	U	48733 µg/kg	404	1	"	05/27/03
Aroclor-1254	**1510**		404	"	"	"
Aroclor-1260	**723**		404	"	"	"

Analyte	Result µg/kg dry	Analyte Qualifiers	%Recovery	%Recovery Limits	Prepared	Analyzed
Surr: Tetrachloro-meta-xylene	2970		58.8	11-113	"	"
Surr: Decachlorobiphenyl	3780		74.9	35-138	"	"
% Solids	**85.4**			1	03/31/03	04/01/03

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Aroclors by EPA Method 8082 - GC/ECD

Lab ID: 0303049-03 **Station ID: 3**

Batch:B3D0404 Date Collected: 03/24/03
Matrix: Solid Sample Volume: 2.305g Sample Qualifiers:

Analyte	Result µg/kg dry	Analyte Qualifiers	Reporting Limit	Dilution	Prepared	Analyzed
Aroclor-1016	U		211	1	04/03/03	05/27/03
Aroclor-1221	U		421	"	"	05/27/03
Aroclor-1232	U		211	"	"	"
Aroclor-1242	**12700**	36,940 ug/kg	1260	6	"	05/27/03
Aroclor-1248	U		211	1	"	05/27/03
Aroclor-1254	**19700**		1260	6	"	05/27/03
Aroclor-1260	**4540**		1260	"	"	"

Analyte	Result µg/kg dry	Analyte Qualifiers	%Recovery	%Recovery Limits	Prepared	Analyzed
Surr: Tetrachloro-meta-xylene	2680		102	11-113	"	"
Surr: Decachlorobiphenyl	2380		90.5	35-138	"	"
% Solids	**82.4**			1	03/31/03	04/01/03

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Aroclors by EPA Method 8082 - GC/ECD

Lab ID: 0303049-04 **Station ID: 4**

Batch:B3D0404 Date Collected: 03/24/03
Matrix: Solid Sample Volume: 2.148g Sample Qualifiers:

Analyte	Result µg/kg dry	Analyte Qualifiers	Reporting Limit	Dilution	Prepared	Analyzed
Aroclor-1016	U		208	1	04/03/03	05/27/03
Aroclor-1221	U		417	"	"	"
Aroclor-1232	U		208	"	"	"
Aroclor-1242	**1640**		208	"	"	"
Aroclor-1248	U		208	"	"	"
Aroclor-1254	U		208	"	"	"
Aroclor-1260	U		573	"	"	"

Analyte	Result µg/kg dry	Analyte Qualifiers	%Recovery	%Recovery Limits	Prepared	Analyzed
Surr: Tetrachloro-meta-xylene	2100		80.8	11-113	"	"
Surr: Decachlorobiphenyl	2030		78.1	35-138	"	"
% Solids	**89.4**			1	03/31/03	04/01/03

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Aroclors by EPA Method 8082 - GC/ECD

Lab ID: 0303049-05 **Station ID: 5**

Batch:B3D0404 Date Collected: 03/24/03
Matrix: Solid Sample Volume: 1.42g Sample Qualifiers:

Analyte	Result µg/kg dry	Analyte Qualifiers	Reporting Limit	Dilution	Prepared	Analyzed
Aroclor-1016	U		316	1	04/03/03	05/27/03
Aroclor-1221	U		631	"	"	05/27/03
Aroclor-1232	U		316	"	"	"
Aroclor-1242	**22700**	29,660 ug/kg	3160	10	"	05/27/03
Aroclor-1248	U		316	1	"	05/27/03
Aroclor-1254	**5830**		3160	10	"	05/27/03
Aroclor-1260	**1130**		316	1	"	05/27/03

Analyte	Result µg/kg dry	Analyte Qualifiers	%Recovery	%Recovery Limits	Prepared	Analyzed
Surr: Tetrachloro-meta-xylene	2830		71.6	11-113	"	"
Surr: Decachlorobiphenyl	3020		76.5	35-138	"	"
% Solids	**89.2**			1	03/31/03	04/01/03

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Aroclors by EPA Method 8082 - GC/ECD

Lab ID: 0303049-06 **Station ID: 6**

Batch:B3D0404 Date Collected: 03/24/03
Matrix: Solid Sample Volume: 1.27g Sample Qualifiers:

Analyte	Result µg/kg dry	Analyte Qualifiers	Reporting Limit	Dilution	Prepared	Analyzed
Aroclor-1016	U		348	1	04/03/03	05/27/03
Aroclor-1221	U		696	"	"	05/27/03
Aroclor-1232	U		348	"	"	"
Aroclor-1242	**46700**		3480	10	"	05/27/03
Aroclor-1248	U	47,940 ug/kg	348	1	"	05/27/03
Aroclor-1254	U		348	"	"	"
Aroclor-1260	**1240**		348	"	"	"

Analyte	Result µg/kg dry	Analyte Qualifiers	%Recovery	%Recovery Limits	Prepared	Analyzed
Surr: Tetrachloro-meta-xylene	3830		88.0	11-113	"	"
Surr: Decachlorobiphenyl	3430		78.9	35-138	"	"
% Solids	**90.4**			1	03/31/03	04/01/03

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Region 6 Laboratory
10625 Fallstone Road, Houston, TX 77099
Phone:(281)983-2100 Fax:(281)983-2248

Aroclors by EPA Method 8082 - GC/ECD

Lab ID: 0303049-07 **Station ID: 7**

Batch: B3D0404 Date Collected: 03/24/03
Matrix: Solid Sample Volume: 2.225g Sample Qualifiers:

Analyte	Result µg/kg dry	Analyte Qualifiers	Reporting Limit	Dilution	Prepared	Analyzed
Aroclor-1016	U		195	1	04/03/03	05/27/03
Aroclor-1221	U		390	"	"	"
Aroclor-1232	U		195	"	"	"
Aroclor-1242	**1190**		779	4	"	05/28/03
Aroclor-1248	U		195	1	"	05/27/03
Aroclor-1254	**1530**	3556	195	"	"	"
Aroclor-1260	**836**		195	"	"	"

Analyte	Result µg/kg dry	Analyte Qualifiers	%Recovery	%Recovery Limits	Prepared	Analyzed
Surr: Tetrachloro-meta-xylene	1920		78.7	11-113	"	"
Surr: Decachlorobiphenyl	2220		91.0	35-138	"	"
% Solids	**92.3**			1	03/31/03	04/01/03

Environmental Protection Agency

Region 6 Laboratory

10625 Fallstone Road, Houston, TX 77099
Phone:(281)983-2100 Fax:(281)983-2248

Aroclors by EPA Method 8082 - GC/ECD

Lab ID: 0303049-08 **Station ID: 8**

Batch:B3D0404 Date Collected: 03/24/03
Matrix: Solid Sample Volume: 2.142g Sample Qualifiers:

Analyte	Result µg/kg dry	Analyte Qualifiers	Reporting Limit	Dilution	Prepared	Analyzed
Aroclor-1016	U		208	1	04/03/03	05/27/03
Aroclor-1221	U		417	"	"	"
Aroclor-1232	U		208	"	"	"
Aroclor-1242	**5870**		417	2	"	05/28/03
Aroclor-1248	U		208	1	"	05/27/03
Aroclor-1254	**2590**		208	"	"	"
Aroclor-1260	**1670**		208	"	"	"

Analyte	Result µg/kg dry	Analyte Qualifiers	%Recovery	%Recovery Limits	Prepared	Analyzed
Surr: Tetrachloro-meta-xylene	1780		68.5	11-113	"	"
Surr: Decachlorobiphenyl	1990		76.5	35-138	"	"
% Solids	**89.6**			1	03/31/03	04/01/03

Environmental Protection Agency
Region 6 Laboratory
10625 Fallstone Road, Houston, TX 77099
Phone:(281)983-2100 Fax:(281)983-2248

Aroclors by EPA Method 8082 - GC/ECD - Quality Control

Batch: B3D0404

Blank (B3D0404-BLK1)

Prepared: 04/03/03 Analyzed: 05/27/03

ANALYTE	Result µg/kg dry	Analyte Qualifiers	Reporting Limit	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit
Aroclor-1016	U		78.0						
Aroclor-1221	U		156						
Aroclor-1232	U		78.0						
Aroclor-1242	U		78.0						
Aroclor-1248	U		78.0						
Aroclor-1254	U		78.0						
Aroclor-1260	U		78.0						

ANALYTE	Result µg/kg dry	Analyte Qualifiers	Spike Level	%REC	%REC Limits
Surr: Tetrachloro-meta-xylene	1190		975	122 #	11-113
Surr: Decachlorobiphenyl	1250		975	128	35-138

LCS (B3D0404-BS1)

Prepared: 04/03/03 Analyzed: 05/27/03

ANALYTE	Result µg/kg dry	Analyte Qualifiers	Reporting Limit	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit
Aroclor-1242	1990		156	1950		102	70-130		

ANALYTE	Result µg/kg dry	Analyte Qualifiers	Spike Level	%REC	%REC Limits
Surr: Tetrachloro-meta-xylene	871		975	89.3	11-113
Surr: Decachlorobiphenyl	969		975	99.4	35-138

Environmental Protection Agency

Region 6 Laboratory

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Phone:(281)983-2100 Fax:(281)983-2248

Aroclors by EPA Method 8082 - GC/ECD - Quality Control

Batch: B3D0404

Matrix Spike (B3D0404-MS1)

Source: 0303049-07 Prepared: 04/03/03 Analyzed: 05/28/03

ANALYTE	Result µg/kg dry	Analyte Qualifiers	Reporting Limit	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit
Aroclor-1242	3780		780	4870	1190	53.2	50-150		

ANALYTE	Result µg/kg dry	Analyte Qualifiers	Spike Level	%REC	%REC Limits
Surr: Tetrachloro-meta-xylene	1350		2440	55.3	11-113
Surr: Decachlorobiphenyl	1910		2440	78.3	35-138

Matrix Spike Dup (B3D0404-MSD1)

Source: 0303049-07 Prepared: 04/03/03 Analyzed: 05/28/03

ANALYTE	Result µg/kg dry	Analyte Qualifiers	Reporting Limit	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit
Aroclor-1242	4510		832	5200	1190	63.8	50-150	18.1	25

ANALYTE	Result µg/kg dry	Analyte Qualifiers	Spike Level	%REC	%REC Limits
Surr: Tetrachloro-meta-xylene	1400		2600	53.8	11-113
Surr: Decachlorobiphenyl	1840		2600	70.8	35-138

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Notes and Definitions

R6A	This sample was extracted at a single acid pH.
R6T	The compounds listed are tentatively identified by the best match with the NIST or Wiley mass spectral data base or by manual interpretation. The concentrations are estimated based on a Response Factor of 1.0 to the nearest internal standard.
AES	Atomic Emission Spectrometer
CVAA	Cold Vapor Atomic Absorption
ECD	Electron Capture Detector
GC	Gas Chromatograph
GFAA	Graphite Furnace Atomic Absorption
ICP	Inductively Coupled Plasma
MS	Mass Spectrometer
NA	Not Applicable
NPD	Nitrogen Phosphorous Detector
NR	Not Reported
TCLP	Toxicity Characteristic Leaching Procedure
U	Undetected
#	Out of QC limits

The pH reported for Volatile liquid samples was tested using a 0-14 pH indicator strip for the purpose of verifying chemical preservation.

FACILITY NAME:
EPA ID NUMBER:

PCB Inspection Checklist

I. OPENING CONFERENCE

A. **Present credentials, Notice of Inspection, & Inspection Confidentiality Notice**

B. **Inform officials of reason for inspection, how to make confidentiality claims, and approx. how long inspection will take.**

III. BACKGROUND

A. Date of inspection: 3-24-03

B. Facility name, address and phone # Commercial Metals Company Corpus Christi
4614 Agnes St. (HW 44)
Corpus Christi, Tx 78405

The address of company headquarters if located elsewhere
Commercial Metals Company
6565 N. MacArthur Blvd, Ste 800
Irving, TX 75039

C. Is the company a subsidiary of another? NO ☐ YES ☐ If so, get name and address of parent company and date of acquisition (month, day and year, if possible).

D. Inspector(s) present KEN OFUNREIN

E. Facility representative(s) present, incl. title(s) Wes Constable, Manager
Keith Hoelscher, Environmental Coordinator
Kelly Nash, Enviromental Manager (by telephone)

F. Is it a commercial building? NO ☐ YES ☒

G. Utility? NO ☒ YES ☐

H. Industrial Plant? NO ☐ YES ☒ Shredder

Operations being performed —

what manufactured/facility function:

processes/equipment used: (See attached shredder questionaire)

I. Age/ownership history of the site

FACILITY NAME:
EPA ID NUMBER:

J. Do they currently/have they ever had PCBs/PCB-containing equipment? NO ☐ YES ☐

IIII. PCB USE § 761.30

A. Transformers N/A

May assume Non-PCB for Transformers < 3 lbs. fluid, circuit breakers, reclosers, cable and rectifiers where PCB concentration is unknown.
Must assume PCB-contaminated for Mineral Oil Equipment mfg. prior to 7/2/79 where PCB concentration not determined.
Must assume Mineral Oil for all pole and pad distribution Transformers mfg. prior to 7/2/79.
May assume Electrical Equipment mfg. after 7/2/79 is Non-PCB.
Must assume PCB-contaminated if the date of mfg. of Mineral Oil equipment is unknown.
Must assume PCB-Transformer if mfg. prior to 7/2/79 with > 3 lbs. fluid other than mineral oil where PCB concentration not determined or when date or type of fluid is unknown.

1. Are any PCB-Transformers (>500 ppm) or PCB-Contaminated Transformers in use/stored for reuse? NO ☐ YES ☐

(NOTE: Questions 2 - 16 pertain to PCB transformers)

2. Do any PCB Transformers pose an exposure risk to food or feed? NO ☐ YES ☐

3. Any higher secondary voltage (≥ 480 volts) network, lower secondary voltage (< 480 volts) network or higher secondary voltage radial PCB Transformers in or near commercial buildings? NO ☐ YES ☐

4. Were PCB-Transformers in use registered with EPA by 12/28/98? NO ☐ YES ☐

5. Have any PCB-Contaminated Transformers been discovered to be PCB-Transformers after 12/28/98? NO ☐ YES ☐

   If yes: Were Transformers registered with EPA within 30 days? (**A person taking possession of a PCB-Transformer after 12/28/98 is NOT required to register or re-register the Transformer.**)

6. Have PCB-Transformers registration records been maintained? NO ☐ YES ☐

7. Have all PCB-Transformers been registered *In writing* with the building owner if in or near a commercial building? NO ☐ YES ☐ N/A ☐

FACILITY NAME:
EPA ID NUMBER:

PCB USE - Transformers (Continued)

8. Are combustible materials stored inside a PCB-Transformer enclosure? NO ☐ YES ☐

Within 5 meters of a PCB-Transformer enclosure? NO ☐ YES ☐

Within 5 meters of a PCB-Transformer? NO ☐ YES ☐

9. Are Quarterly PCB-Transformer inspections made? NO ☐ YES ☐

Annual inspections may be performed in lieu of Quarterly IF:

a. Secondary containment of 100 percent of the capacity of the Transformer is provided;

OR

b. PCB concentration of Transformer is <60,000ppm 90 days after service to reduce the PCB concentration.

10. Have there been any fires involving PCB-Transformers? NO ☐ YES ☐

If yes: Date?_____ Who responded? _____ Did Transformer rupture?____

Was fire reported to the National Response Center? NO ☐ YES ☐

11. Do Quarterly PCB-Transformer inspection records include:

Location _____ Inspection Date_____ Inspectors Name_____

Date Leak Discovered_____ Location of Leak_____

Estimate of PCB Amt. released_____

Date of Cleanup_____ Containment_____ Repair_____

Description of Cleanup _____

12. Are PCB-Transformers labeled with 6x6 ML? NO ☐ YES ☐

13. Is all equipment containing a PCB-Transformer marked? NO ☐ YES ☐

14. Are means of access to PCB-Transformer enclosures marked with M_L? NO ☐ YES ☐

FACILITY NAME:
EPA ID NUMBER:

15. Were any leaking PCB or PCB-Contaminated Transformers observed.? NO ☐ YES ☐

16. Have any Mineral Oil-containing Transformer been tested and found to be >500 ppm PCB? NO ☐ YES ☐

B. Large Capacitors N/A

A small capacitor - a capacitor which contains <3 lbs. of dielectric fluid (<100 in³)
Large High Voltage Capacitor - ≥3 lbs. of dielectric fluid and operating at ≥2000 volts
Large Low Voltage Capacitor - ≥3 lbs. dielectric fluid and operating below 2000 volts A.C. or D.C.
Light ballasts are regulated for commercial sources.

Must assume Capacitor mfg. prior to 7/2/79 with no test is PCB.
May assume Capacitor mfg. after 7/2/79 is non-PCB.
Must assume Capacitor is PCB if mfg. date unknown.
May assume Capacitor marked Non-PCB by mfg. is Non-PCB.
May assume Capacitor < 100 in³ is < 3 lbs. fluid and Capacitor > 200 in³ is > 3 lbs. fluid.
May assume Capacitor > 100 in³ but < 200 in³ is < 3 lbs. fluid if total weight of Capacitor is < 9 lbs.

1. Are any PCB-Capacitors in use/stored for reuse? NO ☐ YES ☐ How many?_____

2. Are 50 ppm PCB LHV or LLV Capacitors in use or storage? NO ☐ YES ☐

3. Are Capacitors marked with M_L? (LHVC and LLVC (§761.40(k)(1)) **in service needs to be marked**) NO ☐ YES ☐

4. Have any Capacitors been removed from service? NO ☐ YES ☐
   If yes: have Capacitors been individually labeled with M_L? NO ☐ YES ☐

5. Are all Capacitors equipped with nameplates specifying the type of dielectric fluid?
   NO ☐ YES ☐ **(Capacitors without nameplates must be assumed to be PCB)**

6. Are any Capacitors manufactured after 7/1/78 in use at the facility? NO ☐ YES ☐
   If yes: are these Capacitors marked "No PCBs"? NO ☐ YES ☐

FACILITY NAME:
EPA ID NUMBER:

PCB USE (Continued)

7. Were any leaking Capacitors observed during the inspection? NO ☐ YES ☐

*(NOTE: **Use of PCB-Capacitors after 10/1/88 is prohibited except for:***

1. ***Restricted Access and Contained Indoor Installation***
2. ***Restricted Access Substations***)

C. Other electrical equipment N/A

1. Any oil-filled switches, circuit breakers, reclosers, voltage regulators, etc. in use/stored for reuse? NO ☐ YES ☐
   a. # PCB_____
   b. # PCB contaminated _____

2. How concentration determined (by test, asked the mfr.)?

D. Heat transfer systems

2. **Note: found most often in chemical industry.**
3. Age
4. Purchased new or used?
5. Type of fluid
6. Capacity
7. Operating temperature
8. Was it tested[2], drained and refilled **(not applicable to all systems)**?

E. Hydraulic systems

1. Any hot oil-based systems used? NO ☐ YES ☐ If so:
   a. Age
   b. Brand of oil
   c. Operating temp
   d. Capacity (gallons)
   e. Ever contain PCB?
   f. Ever PCB tested?
   g. Any water cooling?
      (1) Any contact with system (open/closed system)?
      (2) Where is water discharged?
         (a) Do some/all their own treatment?
         (b) Water tested for PCB?
         (c) Who tests?

2. **Note: PCBs are often used in hot hydraulic systems (because of its heat resistance) which in turn find use mainly in the metal-working industries like die casters, iron foundries, forges and metal formers, in the following types of equipment: die-cast machines, metal pouring mechanisms of metal melting furnaces, furnace hydraulics (often door opening/ closing mechanisms), forge presses, high tension welding machines and flame hardening equipment. PCBs can also be found contaminating the hydraulics of some "cold" (room temp) systems,**

FACILITY NAME:
EPA ID NUMBER:

again usually in the metal-working industries. Some examples are: drills, mills, broaches, chukkers, boring machines, gear machines, grinders, presses, lathes and threaders.

F. Record keeping *(Note: Go to Record keeping Inspection Sheet, Module VIII.)*

IV. STORAGE FOR REUSE (§761.35) N/A

(NOTE: Persons storing PCB Articles for reuse must follow all use conditions at §761.30 and marking requirements at Subpart C that are applicable to the PCB Articles)

A. Are PCB Articles stored for reuse in an area that does not comply with §761.65(b)?

NO ☐ YES ☐ If yes, continue with checklist items B and C.

B. Are the following records available for each unit stored in an area that does not comply with §761.65(b)? NO ☐ YES ☐

1. date articles was removed from use?

2. projected location and future use of articles?

3. If applicable, scheduled repair/servicing dates?

C. Have any articles been stored for reuse for more than 5 years since August 28, 1998? NO ☐ YES ☐

D. Annual Records (*NOTE: **the information in B above, if not recorded on the item or maintained in a separate log, should be maintained in the annual document log. Go to Record keeping Inspection Sheet, Module VIII)***

FACILITY NAME:
EPA ID NUMBER:

V. STORAGE FOR DISPOSAL §761.65 N/A

A. §761.65(b) Storage for Disposal Unit (SFDU) Requirements (*NOTE: **Conditions for PCB storage may differ for TSCA and RCRA or other alternative SFDUs)***

1. Does it have an adequate roof, walls and floor? NO ☐ YES ☐

2. Is the floor smooth and impervious (as defined in §761.3) with continuous 6" (minimum) curbing? NO ☐ YES ☐ *(NOTE: **a 6" curb not required for RCRA storage areas)***

3. Are any drain valves, floor drains, expansion joints, sewer lines or other openings that would permit escape of liquid from containment area? NO ☐ YES ☐

4. Is the containment volume adequate? NO ☐ YES ☐

(At least 2 times the internal volume of the largest PCB article/container or 25 percent of the total internal volume of all PCB articles or containers in storage. For RCRA units, 1times the internal volume of the largest or 10% of the total internal volume)

5. Is the SFDU above the 100-yr flood plain elevation? NO ☐ YES ☐

6. Is the SFDU marked with a 6x6 M_L label? NO ☐ YES ☐

B. PCB Storage N/A

1. Are any PCB's/ PCB Items stored within the SFDU? NO ☐ YES ☐

If yes: **Obtain an itemized inventory.**

2. Are items dated when they were taken out of service for disposal? NO ☐ YES ☐

3. Are items checked every 30 days for leaks? NO ☐ YES ☐

FACILITY NAME:
EPA ID NUMBER:

STORAGE FOR DISPOSAL (Continued)

4. Are leaks cleaned up immediately? NO ☐ YES ☐

5. Are PCB Transformers, PCB Containers, or PCB Capacitors marked with M_L? NO ☐ YES ☐

6. Are any PCB Items declared "for disposal" stored outside the SFDU? NO ☐ YES ☐

   If yes: is the applicable marking, 30 day temporary storage limit, reserve SFDU storage capacity, inspection frequency, SPCC plan requirements met? NO ☐ YES ☐

7. Are stationary tanks being used to store PCB items for disposal? NO ☐ YES ☐ (§761.65(c)(7))? If yes, go to Waste Oil Inspection Sheet, Module VII)

C. Commercial PCB Storage N/A

1. Are PCBs generated by others stored for disposal at this facility? NO ☐ YES ☐

2. If yes, does the facility have a TSCA PCB commercial disposal approval, TSCA interim status authorization, a RCRA Part B container storage permit, or is the facility a transfer facility storing PCB waste for ≤ 10 days? NO ☐ YES ☐

3. If the facility is a TSCA facility, is a copy of the current closure plan, closure cost estimate and financial assurance documentation available for review? NO ☐ YES ☐

4. If the facility has a commercial storage approval, **check storage inventory against maximum capacity limits and waste types approved for storage in written approval.**

FACILITY NAME:
EPA ID NUMBER:

VI. DISPOSAL & SPILLS (§761.60 & 761 Subpart G)

A. **Ever** dispose of any PCBs/Items? NO ☒ YES ☐ If so:

1. Liquids
   a. Quantity (gallons, kg, etc.)
   b. Date(s)
   c. Manifest #(s)
   d. Certificate(s) of Disposal

2. PCB Articles
   a. Type of equipment (tfs, regulators, circuit breakers, etc.) disposed
   b. Quantity / weight
   c. Date(s)
   d. Manifest #(s) (if no manifest, note who transported and who disposed)
   e. Certificate(s) of Disposal

3. PCB Containers
   a. Quantity
   b. Quantity / weight
   c. Date(s)
   d. Manifest #(s) (if no manifest, note who transported and who disposed)
   e. Certificate(s) of Disposal
   f. Decontamination

B. Each PCB disposal manifest since 2/5/90 should contain the following info:
1. EPA ID #
2. Identity of waste
3. Serial #/other means of ID if no serial # (not req. for bulk waste)
4. (Earliest) date out of service for disposal
5. Weight in kg for each Item disposed

FACILITY NAME:
EPA ID NUMBER:

DISPOSAL & SPILLS (Continued)

6. Note transporter and/or designated disposers:

Note: **disposal manifests and Certificates of Destruction are collectively called "annual records," and the requirements to keep them didn't begin until disposals made on or after 2/5/90**; therefore, if there have been any disposals since 2/5/90, do they have the required manifests and Certificates of Destruction? NO ☐ YES ☐

C. Ever have any PCB spills? NO ☐ YES ☐ If so:

1. Source
2. When
3. Quantity of PCB involved
4. Cleaned up per 761 Subpart G? NO ☐ YES ☐
   a. When
   b. By whom
   c. How debris disposed
5. Clean up report prepared? NO ☐ YES ☐
6. Post clean up test results OK? NO ☐ YES ☐

D. Ever have any fires involving PCBs/Items? NO ☐ YES ☐ (When, quantity, cleanup)

FACILITY NAME:
EPA ID NUMBER:

VII. WASTE OIL

A. Are **any** waste oils generated, used, or stored at the facility? NO ☐ YES ☐

B. What is the source of the waste oils? Routine equipment maintenance

C. Are waste oils tested for PCBs? NO ☐ YES ☐

D. Check class of oils generated, used or stored.

1. Waste oil containing 2 - 49 ppm PCBs N/A
2. Waste oil containing 50 - 499 ppm PCBs N/A
3. Waste oil containing > 500 ppm PCBs N/A

E. Are waste oils picked up by a recycler? NO ☐ YES ☒
Name of recycler? Southwest Land & Marine

F. Are waste oils burned at the facility? NO ☒ YES ☐

If yes:

1. Has facility notified EPA-RCRA as used oil burner? NO ☐ YES ☐
2. Is burner unit a "qualified incinerator" as defined under §761.3? NO ☐ YES ☐
Type of burner? _____

G. Have any PCB-contaminated waste oils (50-500ppm) been shipped to a commercial storage/disposal facility? NO ☒ YES ☐ N/A Rev

H. Have any PCB-contaminated waste oils (50-500ppm) been sold for fuel or burned in a high efficiency boiler? NO ☒ YES ☐

I. Are bulk storage tanks used for waste oils containing < 50 ppm PCB? NO ☒ YES ☐

J. Is an SPCC plan available for < 50 ppm PCB bulk storage tanks? NO ☐ YES ☐ N/A

K. Are bulk storage tanks labeled? (**These tanks must be labeled if the PCB concentration is unknown or >50ppm.**) NO ☐ YES ☐ N/A

L. Are in-out records (date/amt.) available for bulk storage tanks? (§761.65(c)(8)) NO ☐ YES ☐ N/A

M. Have PCB fluids (>500 ppm) ever been added to bulk storage tanks? NO ☐ YES ☐ N/A

N. Have PCB-contaminated fluids (50-500 ppm) ever been added to <50 ppm PCB bulk storage tanks? NO ☐ YES ☐ N/A

FACILITY NAME:
EPA ID NUMBER:

VIV. RECORD KEEPING §761.180

A. Annual Documents N/A

Annual Document Logs should constitute single documents which include all of the required elements identified in § 761.180(a).
Annual Records constitute all signed manifests and all Certificates of Disposal received during the calendar year plus all records of inspection and cleanup performed in accordance with 761.65(c)(5) for the year.
Annual REPORTS are required to be submitted by a COMMERCIAL STORER ONLY by 7/15 and based on ADL & AR Records.

1. Are Annual Document Logs (ADL) and Annual Records (AR) available? NO ☐ YES ☐

2. Is ADL on calendar year basis? (§761.180(a) **1989 must cover 1/1/89 - 2/5/90 1990 must cover 2/6/90 - 12/31/90**) NO ☐ YES ☐

3. Are ADLs retained for 3 years? NO ☐ YES ☐

4. Does ADL list the unique manifest number for all shipments during the calendar year? (§761.180(a)(2)(ii)) NO ☐ YES ☐

5. Do ADLs list total number of PCB-Containers and the Total Weight in kg of the contents of PCB-Containers? NO ☐ YES ☐

6. Are PCB-Transformers removed from service and PCB Articles stored at the facility itemized in ADL? NO ☐ YES ☐

7. Is the Total Weight (kg) of PCB's contained in these transformers shown? NO ☐ YES ☐

8. Date Transformers removed from service? NO ☐ YES ☐

9. Date Transformers placed into transport for disposal? NO ☐ YES ☐

FACILITY NAME:
EPA ID NUMBER:

Record keeping (Continued)

10. Is the number of PCB-Transformers and the Total Weight (kg) of PCB's remaining in service at a calendar year end shown? NO☐ YES ☐

11. Are PCB-Voltage Regulators recorded as PCB-Transformers? NO ☐ YES ☐

12. Are LHV/LLV PCB-Capacitors removed from service itemized? NO ☐ YES ☐

13. Date Capacitors removed from service? NO YES ☐

14. Date Capacitors placed into transport for disposal? NO ☐ YES ☐

15. Is the number of PCB LHV/LLV Capacitors remaining in service at calendar year end shown? NO ☐ YES ☐

16. Is the number of PCB-Containers in the SFDU area shown? NO ☐ YES ☐

17. Is the Weight (kg) of these PCBs also shown? NO ☐ YES ☐

18. Are the container contents identified? NO ☐ YES ☐

19. Are PCB-Items in containers listed? NO ☐ YES ☐

20. Date containers placed into storage? NO ☐ YES ☐

FACILITY NAME:
EPA ID NUMBER:

Record keeping (Continued)

21. Date containers placed into transport for disposal? NO ☐ YES ☐

22. Are PCB-Items distributed in commerce listed? NO ☐ YES ☐

23. Name, address, and phone number of receiving facility shown? NO ☐ YES ☐

24. Date of transfer shown? NO ☐ YES ☐

25. Serial number or internal ID number shown? NO ☐ YES ☐

26. Are names/locations of disposal/storage facilities for PCB shipments shown? NO ☐ YES ☐

CLOSING CONFERENCE:

Attendees: Mr. Wes Constable
Mr. Keith Hoelscher
Mr. Kelly Nash (Telephone)

Deficiencies:

No PCB reg. deficiencies observed at the time of inspection

Recommendations:

None.

"Receipt for Samples and Documents" signed?

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

SEP 1 2004

Wes Constable
Manager
Commercial Metals Company
4614 Agnes Street (Hwy 44)
Corpus Christi, TX 78405

Dear Mr. Constable:

A representative of the U.S. Environmental Protection Agency (EPA), Region 6 conducted a Polychlorinated biphenyl (PCB) inspection of your facility under the authority of Section 11 of the Toxic Substances Control Act (TSCA), 15 U.S.C. § 2610, on March 24, 2003. A copy of the inspection report is enclosed. The EPA will be contacting you regarding potential violations of the TSCA PCB regulations.

The EPA supports and encourages your efforts to eliminate PCBs from your shredder fluff by implementing a source control program. However, a source control program (unless approved by EPA pursuant to § 761.62(c)) is not a substitute for compliance with the PCB disposal regulations. The PCB regulations provide the following options for disposal of shredder fluff:

- 40 C.F.R. § 761.62(a) - waste from the shredding of automobiles or household appliances from which **every PCB small capacitor was not removed** - TSCA PCB approved incinerator or landfill, RCRA approved hazardous waste landfill, TSCA alternate disposal approval under 40 C.F.R. § 761.60(e), decontamination per 40 C.F.R. § 761.79

- 40 C.F.R. § 761.62(b) - waste from the shredding of automobiles or household appliances from which **PCB small capacitors have been removed** - disposal in a facility permitted, licensed, or registered by a State as a municipal or non-municipal non-hazardous waste landfill

- 40 C.F.R. § 761.62(c) - waste from the shredding of automobiles or household appliances from which **every PCB small capacitor was not removed** - apply in writing for a risk-based disposal approval

Furthermore, if your shredder fluff meets the definition of PCB bulk product waste in 40 C.F.R. § 761.3, and any of the items from which your shredder fluff was derived contained ≥ 50 ppm PCBs at the time they were designated for disposal, the shredder fluff is regulated for storage in accordance with 40 C.F.R. § 761.65. The appropriate storage requirements for PCB bulk product waste are listed under 40 C.F.R. § 761.65(c)(9). These requirements allow shredder fluff to be stored at the site of generation for up to 180 days subject to certain conditions (Section 761.65(c)(9)(i)-(iii)). Specifically, § 761.65(c)(9)(i) requires control of wind dispersal by means other than wetting. Section 761.65(c)(9)(ii) requires no generation of leachate through decomposition or other reactions. Section 761.65(c)(9)(iii)(A) requires a liner that is designed, constructed, and installed to prevent any migration of wastes into soil and ground or surface water. Section 761.65(c)(9)(iii)(B) requires that the shredder area be covered to prevent the fluff from becoming saturated by precipitation. Section 761.65(c)(9)(iii)(C)(2) requires that any storm water diverted from around the shredder fluff storage areas be collected and controlled.

The Toxic Substances Control Act (TSCA), which provides the authority for the PCB regulations codified at 40 C.F.R. Part 761, is a strict liability statute. Accordingly, a lack of intent to violate, and even a good faith effort to comply with, TSCA's requirements does not provide a defense to liability in the case of a violation, 15 U.S.C. § 2614; In the Matter of Leonard Strandley, TSCA Appeal No. 89 4, 3 EAD 718, 722 (November 25, 1991).

As your source control program, as identified at the time of inspection, does not ensure that every capacitor is removed and you have sent your shredder fluff to a municipal landfill, EPA may be requesting additional information from you and/or requesting your attendance at a pre-enforcement meeting. If you have any questions regarding this report or the TSCA PCB regulations, please contact Ms. Lou Roberts, Regional PCB Coordinator, at (214) 665-7579.

Sincerely yours,

Mark Hansen
Acting Chief
Air/Toxics Inspection &
Coordination Branch

Enclosure

cc: Mr. Kelly Nash, Environmental Manager
Commercial Metals Company
Dallas, TX

El Centro Landfill (w/o enclosure)
Robstown, TX

FACILITY NAME: Commercial Metals Company, Corpus Christi
EPA ID NUMBER: TXD070482757

INSPECTION/REVIEW COMMENTS

1. INSPECTED BY: _____ Texas Dept. Of Health, March 24, 2003
(Signature) (Agency and Date of Inspection)
(Ken Ofunrein, R.S.)

2. REVIEWED BY: Alan Morris Texas Dept. Of Health, 3/18/04
(Signature) (Agency and Date of Review)
(Alan Morris, Director, Toxic Substances Control Division)

3. Comments

Commercial Metals Company located in Corpus Christi, Texas, was targeted for a polychlorinated biphenyl (PCB) inspection on the 2002-2003 Texas state neutral scheme under the "Shredder Initiative" category. Available Toxic Substances Control Act (TSCA) records indicate that no PCB compliance inspection had been conducted at this facility.

Inspection Narrative

On March 24, 2003, at 8:56 am, Mr. Ken Ofunrein, R.S., TSCA Inspector, arrived at Commercial Metals Company, located at 4614 Agnes Street (Highway 44), Corpus Christi, Texas 78405. The inspector met Mr. Wes Constable, Manager, and Mr. Keith Hoelscher, Environmental Coordinator. Mr. Kelly Nash, Environmental Manager, CMC Secondary Metals Division, was in conference via telephone. The purpose of the inspection was explained to them after the inspector had presented his credentials. Mr. Constable signed the Notice of Inspection form and the TSCA Inspection Confidentiality Notice and copies were provided for his retention.

Facility Description:

Commercial Metals Company, Corpus Christi, belongs to the secondary metals processing division of the Commercial Metals Group. The facility occupies about 15 acres and is located in an industrial zone. The area used for the shredder operation is about 1– 2 acres. According to Mr. Constable, the site is registered as a TCEQ voluntary clean up site because some PCBs were found in the site during a previous investigation.

Commercial Metals Company, Corpus Christi, is a shredder operation that purchases scrap metals that is shredded to recover ferrous and non-ferrous metals. The shreddable materials are sourced from automobiles, white goods, stainless steel and other materials. The facility was a scrap yard prior to when Commercial Metals Company acquired it in the late 1970s. Central Power and Light provides power and the facility does not own transformers. Waste oil is generated from routine maintenance of machinery and vehicles on site.

Physical Inspection:

Areas inspected in the facility included the scale, non-ferrous warehouse, torching area, the shredder, eddy current machine, scrap yard, and salvage waste (fluff) piles.

The scale and radiation detector are located beside the administrative office (see facility map). Trucks carrying scrap are weighed and inspected as they come into the facility. The materials that are not accepted for shredding includes transformers, capacitors and other PCB containing items, gas tanks, compressors and batteries. The radiation detector checks for the presence of radioactive materials. When the truck is weighed and inspected, it is directed to the appropriate area in the plant where it is offloaded. During the inspection of March 24, 2003, a couple of trucks were turned back at the gate because they had white goods with capacitors.

The non-ferrous processing area had a copper bailer. There were large boxes containing nickel alloy, high value metals, stainless steel and brass in the warehouse. Also there were storage bins for radiators. The batteries were wrapped and stored under a roof. Close to the non-ferrous warehouse is the 11,000-ton Vezzani Shearer. It is used to cut aluminum into small pieces and bailed. In the torching area, large metal sheets are cut into smaller pieces and either put into rail cars or put into the shredder for further processing.

The waste oil generated from routine maintenance of machinery is stored in 500-gallon tanks and is recycled by Southwest Land and Marine, Inc. The hydraulic oil used in the plant for equipment maintenance is HYDRON 68 & 48.

Salvage wastes generated from the shredder operation were not containerized at the time of the inspection. There were three piles west of the facility at the time of the inspection. According to Mr. Constable, the salvage waste is disposed of daily at the landfill. However, on the day of the inspection, salvage waste had not been disposed of because the truck was under repair.

Sampling and Laboratory Results:

During the inspection of March 24, 2003, eight samples (five soil and three fluff) were collected at the facility as shown in the chain of custody form (Document No. 6) and duplicate samples were provided to the facility. Sample locations are indicated on the facility map included as document No. 1. The following table shows a summary of the laboratory results of the samples:

LAB RESULTS NOT IN YET

Stn. #	Sample matrix	EPA Lab Result
1	Soil - North of Shearer	6.76 mg/kg
2	Soil – East of shredder	48.73 mg/kg
3	Soil – North of shredder	36.94 mg/kg
4	Fluff pile	1.64 mg/kg
5	Shredder fluff discharge bin	29.66 mg/kg
6	Residue fines - fluff	47.94 mg/kg
7	Soil –SW Shearer discharge	3.56 mg/kg
8	Soil – SW of station #1	10.13 mg/kg

A copy of the laboratory result is included as addendum No. 1.

FACILITY NAME: Commercial Metals Company, Corpus Christi
EPA ID NUMBER: TXD000742403

Record Review

Salvage waste disposal records were reviewed. The facility had never disposed of PCB wastes before and waste oil records indicated that Southwest Land and Marine, Inc recycle it. Landfill records dating back to 2000 were reviewed. Groundwater investigation report dated April 1997 revealed that PCBs in groundwater was below detectable limit. Shredder residue (fluff) monitoring conducted in January 2000, showed that the PCB level was less than 50 ppm.

A closing conference was held with Mr. Constable and Mr. Hoelscher at the end of the inspection with Mr. Nash in attendance via conference telephone call. They were informed that no deficiencies of the PCB regulations were observed at the time of the inspection pending the analysis of the samples collected at the facility.

Laboratory results of the samples collected at Commercial Metals Company, Corpus Christi, analyzed by the EPA Environmental Services Branch Laboratory, Houston, was received on October 22 from Ms. Lou Roberts, EPA Region 6 PCB Coordinator.

FACILITY NAME: Commercial Metals Company, Corpus Christi
EPA ID NUMBER: TXD000742403

1.Describe in detail the location of your salvage facility and surrounding area. *Do you have monitoring wells for ground water?*

The facility is located in an industrial zone. There are about four wells on site but are not currently monitored.

2. *What types of equipment do you use in your day-to-day operations? (Provide a list and capacity of equipment used)*

Equipment	Number of pieces	Manufacturer	Capacity
Shredder	1	Newell 81	
Shearers	2		
Bailers	HRB 1		
Cranes	7		
Bulldozers	1 track loader		
Front end loaders	2		
Trucks	6-7		

3. *What is the* total tonnage of ferrous and non-ferrous metal scrap *generated* by your facility for each of the past three complete calendar years. *How much of that is sold each year. Provide records*

Facility asserts that production data be considered confidential business information. It is so marked as Doc. #4

4. *What types of materials are received for shredding in your facility*? (Specify the type of materials which, when processed through the operation of your shredder, produce salvage waste. Include any and all materials processed, including but not limited to, automobiles, white goods, electronic and electrical equipment.) *Can you quantify the amount in tonnage for each category?*

FACILITY NAME: Commercial Metals Company, Corpus Christi
EPA ID NUMBER: TXD000742403

Material	Supplier/source
Automobiles	Auto wreckers
White Goods	Community
Electronic equipment	None
Steel pipe	Community
Radiators	Community
Aluminum	Community
Copper wire	Peddlers
Brass	Peddlers
Bronze	Peddlers

5. Where do you get them from? Describe from whom or through what method the following materials for salvage operations are obtained:
(1) automobiles
(2) white goods
(3) electronic equipment
(4) electrical equipment
(5) any other material which when processed for salvage produces salvage waste

See table above

6. *Describe how the materials are processed from the point where they are received to when they are shredded.* What do you do with each of these materials before you shred it? (Inspection ____, Weigh ____ etc)

Step me through the process starting at the main gate for materials that are received? Such as a pickup load of mixed material such as radiators, refrigerator and steel pipe and copper tubing towing a car for disposal (Weigh, unload, inspect, etc.?)

When each truck is received, it is weighed and inspected for materials that are accepted for shredding. Two full time employees are dedicated to inspection of materials. This includes transformers, capacitors, gas tanks, other PCB containing items, compressors, and sealed containers.

7. What is the total weight and volume of the materials produced by your shredder operations average per day/month/year?

(Example: the weight of an automobile is one ton. When shredded, the automobile produced X cubic feet of ferrous metal (1,400 lbs), two cubic feet of non-ferrous metal (100 lbs) and two cubic yards of salvage waste (500 lbs)).

What percentage of the material that you put in the shredder comes out as ferrous and non-ferrous metal? Would the remaining percentage of material be sent for disposal? Where do you dispose of the waste material?

75% Steel
8-10% Residue
7% fluff (salvage waste)

8. For each type of material received for shredding, specify:
(1) the constituents of salvage waste (non-metal) produced by your shredder operations,
(2) the probable origin of each constituent,
(3) the percentage by weight of each constituent in relation to the total weight of salvage waste,
(4) the percentage by volume of each constituent in relation to the total volume of salvage waste.

See above

(Example: Salvage waste produced by the shredding of automobiles is approximately
40% by volume and 25% by weight polyurethane foam from seats,
25% by volume and 30% by weight dense plastic from dashboards and electrical insulation,
10% by volume and 15% by weight medium density plastics from seat covers and interior trim,
15% by volume and weight dirt, and
15% by volume 10% by weight paper.)

The salvage waste is passed trough the eddy current system to recover more metals. Plastic and fluff go into a holding tank that is sent to the landfill daily.
Salvage waste (fluff):

about 20% plastic and foam
18% scrap wire dirt and fabrics
34% Dirt
21% scrap wire

9. Specify the content by weight (parts per million) of PCB waste in salvage waste produced by your shredder operations. (Is ferrous material sampled for PCBs before sold to steel mills?)
Less than 50 ppm

How do you check for PCBs in the material that is sent to the disposal site? Do you sample material that is sold?

10. Identify and provide any and all documents regarding the sampling and analysis of salvage waste to determine the presence of PCBs or other hazardous wastes such as RCRA, which were conducted at your facility or which was conducted by any third party.

Materials sent to the landfill is tested periodically. Waste sent to El Central landfill is tested every two years or on demand by the landfill.

11. Does anybody besides you know about identifying PCBs? (any and all persons who may have knowledge of any document regarding the sampling and analysis of salvage waste for the presence of PCBs, or of any sampling and analysis of salvage waste for the presence of PCBs. This SHOULD generate some type of training records)

Kelly Nash and Wes Constable have had PCB training. However, PCB is covered in general terms in the facility's Hazard Communication Program. Employees are taught to identify materials that are not accepted in the facility

12. How long do you keep salvage waste? Describe in detail the method of handling and moving salvage waste at this facility

Facility does not accumulate salvage waste. It is sent to the landfill daily.

13. Describe in detail the method of storage and holding for transportation of salvage waste by this facility.

Salvage waste is stored in one huge tank from which trucks are loaded daily and then sent to the landfill.

14. Specify the maximum amount of salvage waste stored at your salvage facility:
    1) per day - **20-40 tons per day**
    2) per week
    3) per month

15. Specify in detail the method for disposal of salvage waste:
    4) at your facility
    5) by transport for disposal or sale by you to areas off your facility
    6) by sale or other form of transfer to third parties for disposal or transport off your facility

Salvage waste is not sold. Sent to landfill in trucks that are manifested

16. Describe any and all measures to control the unintentional movement or migration of salvage waste within your storage facility or to areas outside your facility.

Never happened

17. Identify by name, location and mailing address any and all disposal facilities into which salvage waste from your facility have been deposited or otherwise placed, by your facility or any third party since August 28, 1998.

El Centro Landfill
A Division of Texas Ecologists
P.O. Box 307
Robstown, TX 78380

The facility has been sending waste to E Centro since 1997. Before then, they used a landfill in San Antonio called Covel Gardens.

18. Do you own a landfill? Specify in detail the design of each disposal facility maintained or previously used on your facility [if landfill], [or identified as off site disposal if landfill, the operator most likely would be clueless to these details].

No

19. Specify for each disposal facility identified as off site disposal whether salvage waste were disposed separately or in combination with other waste.

Facility generates a small amount of packaging waste. Some cardboard pieces is sent with the salvage waste every now and then.

20. Identify in detail and provide copies of any and all documents regarding the transportation of salvage waste from your facility for disposal or any other purpose.

Reviewed some landfill tickets dated January 23 - 24, 2003.

21. Specify if any of the following has been recorded in an existing document in your possession:

7) the concentration of PCBs in water which has leached from salvage waste storage piles to the soil immediately beneath the piles

Not sure if voluntary clean up included groundwater investigation.

2) the depth in such soil to which levels of PCBs or hazardous substances are measurable

Measurable levels of PCBs have been recorded in soil

3) the contamination of off-site areas and the distribution of PCBs off-site where measurements were taken.

No data

4) the distance from salvage waste storage piles to which salvage waste has been found to travel as the result of wind or other disturbances.

Nothing has been blown off by wind and no complaints from neighbors

5) the concentrations of PCBs in surface water runoff from salvage waste storage piles

No data. Corpus Christi Bay is about 10 - 15 miles from the facility

6) the concentration of PCBs in sediment samples from surface water bodies adjoining the site

No data

7) the concentrations of PCBs in groundwater located beneath salvage waste storage piles

PCB was not included in the air quality study

8) the concentrations of PCBs in the air;
   1)1 near salvage waste storage piles during shredding operations - **No data**
   1)2 near shredder during shredding operations - **No data**
   1)3 near salvage waste storage piles - **No data**

FACILITY NAME:
EPA ID NUMBER:

PCB Inspection Checklist

I. OPENING CONFERENCE

A. **Present credentials, Notice of Inspection, & Inspection Confidentiality Notice**

B. **Inform officials of reason for inspection, how to make confidentiality claims, and approx. how long inspection will take.**

III. BACKGROUND

A. Date of inspection: 3-24-03

B. Facility name, address and phone # Commercial Metals Company Corpus Christi
4614 Agnes St. (HWY 44)
Corpus Christi, Tx 78405

The address of company headquarters if located elsewhere
Commercial Metals Company
6565 N. MacArthur Blvd, Ste 800
Irving, TX 75039

C. Is the company a subsidiary of another? NO ☐ YES ☐ If so, get name and address of parent company and date of acquisition (month, day and year, if possible).

D. Inspector(s) present KEN OFUNREIN

E. Facility representative(s) present, incl. title(s) Wes Constable, Manager
Keith Hoelscher, Environmental Coordinator
Kelly Nash, Enviromental Manager (by telephone)

F. Is it a commercial building? NO ☐ YES ☒

G. Utility? NO ☒ YES ☐

H. Industrial Plant? NO ☐ YES ☒ Shredder

Operations being performed ——

what manufactured/facility function:

processes/equipment used: (See attached shredder questionaire)

I. Age/ownership history of the site

FACILITY NAME:
EPA ID NUMBER:

J. Do they currently/have they ever had PCBs/PCB-containing equipment? NO ☐ YES ☐

III. PCB USE § 761.30

A. Transformers N/A

May assume Non-PCB for Transformers < 3 lbs. fluid, circuit breakers, reclosers, cable and rectifiers where PCB concentration is unknown.
Must assume PCB-contaminated for Mineral Oil Equipment mfg. prior to 7/2/79 where PCB concentration not determined.
Must assume Mineral Oil for all pole and pad distribution Transformers mfg. prior to 7/2/79.
May assume Electrical Equipment mfg. after 7/2/79 is Non-PCB.
Must assume PCB-contaminated if the date of mfg. of Mineral Oil equipment is unknown.
Must assume PCB-Transformer if mfg. prior to 7/2/79 with > 3 lbs. fluid other than mineral oil where PCB concentration not determined or when date or type of fluid is unknown.

1. Are any PCB-Transformers (>500 ppm) or PCB-Contaminated Transformers in use/stored for reuse? NO ☐ YES ☐

(NOTE: Questions 2 - 16 pertain to PCB transformers)

2. Do any PCB Transformers pose an exposure risk to food or feed? NO ☐ YES ☐

3. Any higher secondary voltage (≥ 480 volts) network, lower secondary voltage (< 480 volts) network or higher secondary voltage radial PCB Transformers in or near commercial buildings? NO ☐ YES ☐

4. Were PCB-Transformers in use registered with EPA by 12/28/98? NO ☐ YES ☐

5. Have any PCB-Contaminated Transformers been discovered to be PCB-Transformers after 12/28/98? NO ☐ YES ☐

   If yes: Were Transformers registered with EPA within 30 days? (**A person taking possession of a PCB-Transformer after 12/28/98 is NOT required to register or re-register the Transformer.**)

6. Have PCB-Transformers registration records been maintained? NO ☐ YES ☐

7. Have all PCB-Transformers been registered *In writing* with the building owner if in or near a commercial building? NO ☐ YES ☐ N/A ☐

FACILITY NAME:
EPA ID NUMBER:

PCB USE - Transformers (Continued)

8. Are combustible materials stored inside a PCB-Transformer enclosure? NO ☐ YES ☐

Within 5 meters of a PCB-Transformer enclosure? NO ☐ YES ☐

Within 5 meters of a PCB-Transformer? NO ☐ YES ☐

9. Are Quarterly PCB-Transformer inspections made? NO ☐ YES ☐

Annual inspections may be performed in lieu of Quarterly IF:

a. Secondary containment of 100 percent of the capacity of the Transformer is provided;

OR

b. PCB concentration of Transformer is <60,000ppm 90 days after service to reduce the PCB concentration.

10. Have there been any fires involving PCB-Transformers? NO ☐ YES ☐

If yes: Date?_____ Who responded? _____ Did Transformer rupture?____

Was fire reported to the National Response Center? NO ☐ YES ☐

11. Do Quarterly PCB-Transformer inspection records include:

Location _____ Inspection Date_____ Inspectors Name_____

Date Leak Discovered_____ Location of Leak_____

Estimate of PCB Amt. released_____

Date of Cleanup_____ Containment_____ Repair_____

Description of Cleanup _____

12. Are PCB-Transformers labeled with 6x6 ML? NO ☐ YES ☐

13. Is all equipment containing a PCB-Transformer marked? NO ☐ YES ☐

14. Are means of access to PCB-Transformer enclosures marked with M_L? NO ☐ YES ☐

FACILITY NAME:
EPA ID NUMBER:

15. Were any leaking PCB or PCB-Contaminated Transformers observed.? NO ☐ YES ☐

16. Have any Mineral Oil-containing Transformer been tested and found to be >500 ppm PCB? NO ☐ YES ☐

B. Large Capacitors N/A

A small capacitor - a capacitor which contains <3 lbs. of dielectric fluid (<100 in³)
Large High Voltage Capacitor - ≥3 lbs. of dielectric fluid and operating at ≥2000 volts
Large Low Voltage Capacitor - ≥3 lbs. dielectric fluid and operating below 2000 volts A.C. or D.C.
Light ballasts are regulated for commercial sources.

Must assume Capacitor mfg. prior to 7/2/79 with no test is PCB.
May assume Capacitor mfg. after 7/2/79 is non-PCB.
Must assume Capacitor is PCB if mfg. date unknown.
May assume Capacitor marked Non-PCB by mfg. is Non-PCB.
May assume Capacitor < 100 in³ is < 3 lbs. fluid and Capacitor > 200 in³ is > 3 lbs. fluid.
May assume Capacitor > 100 in³ but < 200 in³ is < 3 lbs. fluid if total weight of Capacitor is < 9 lbs.

1. Are any PCB-Capacitors in use/stored for reuse? NO ☐ YES ☐ How many?_____

2. Are 50 ppm PCB LHV or LLV Capacitors in use or storage? NO ☐ YES ☐

3. Are Capacitors marked with M_L? (LHVC and LLVC (§761.40(k)(1)) **in service needs to be marked**) NO ☐ YES ☐

4. Have any Capacitors been removed from service? NO ☐ YES ☐
   If yes: have Capacitors been individually labeled with M_L? NO ☐ YES ☐

5. Are all Capacitors equipped with nameplates specifying the type of dielectric fluid?
   NO ☐ YES ☐ **(Capacitors without nameplates must be assumed to be PCB)**

6. Are any Capacitors manufactured after 7/1/78 in use at the facility? NO ☐ YES ☐
   If yes: are these Capacitors marked "No PCBs"? NO ☐ YES ☐

FACILITY NAME:
EPA ID NUMBER:

PCB USE (Continued)

7. Were any leaking Capacitors observed during the inspection? NO ☐ YES ☐

*(NOTE: **Use of PCB-Capacitors after 10/1/88 is prohibited except for:***

1. ***Restricted Access and Contained Indoor Installation***
2. ***Restricted Access Substations***)

C. Other electrical equipment N/A

1. Any oil-filled switches, circuit breakers, reclosers, voltage regulators, etc. in use/stored for reuse? NO ☐ YES ☐
   a. # PCB_____
   b. # PCB contaminated _____

2. How concentration determined (by test, asked the mfr.)?

D. Heat transfer systems

2. **Note: found most often in chemical industry.**
3. Age
4. Purchased new or used?
5. Type of fluid
6. Capacity
7. Operating temperature
8. Was it tested[2], drained and refilled **(not applicable to all systems)**?

E. Hydraulic systems

1. Any hot oil-based systems used? NO ☐ YES ☐ If so:
   a. Age
   b. Brand of oil
   c. Operating temp
   d. Capacity (gallons)
   e. Ever contain PCB?
   f. Ever PCB tested?
   g. Any water cooling?
      (1) Any contact with system (open/closed system)?
      (2) Where is water discharged?
         (a) Do some/all their own treatment?
         (b) Water tested for PCB?
         (c) Who tests?

2. **Note: PCBs are often used in hot hydraulic systems (because of its heat resistance) which in turn find use mainly in the metal-working industries like die casters, iron foundries, forges and metal formers, in the following types of equipment: die-cast machines, metal pouring mechanisms of metal melting furnaces, furnace hydraulics (often door opening/ closing mechanisms), forge presses, high tension welding machines and flame hardening equipment. PCBs can also be found contaminating the hydraulics of some "cold" (room temp) systems,**

FACILITY NAME:
EPA ID NUMBER:

again usually in the metal-working industries. Some examples are: drills, mills, broaches, chukkers, boring machines, gear machines, grinders, presses, lathes and threaders.

F. Record keeping *(Note: Go to Record keeping Inspection Sheet, Module VIII.)*

IV. STORAGE FOR REUSE (§761.35) N/A

(NOTE: Persons storing PCB Articles for reuse must follow all use conditions at §761.30 and marking requirements at Subpart C that are applicable to the PCB Articles)

A. Are PCB Articles stored for reuse in an area that does not comply with §761.65(b)?

NO ☐ YES ☐ If yes, continue with checklist items B and C.

B. Are the following records available for each unit stored in an area that does not comply with §761.65(b)? NO ☐ YES ☐

1. date articles was removed from use?

2. projected location and future use of articles?

3. If applicable, scheduled repair/servicing dates?

C. Have any articles been stored for reuse for more than 5 years since August 28, 1998? NO ☐ YES ☐

D. Annual Records (*NOTE: **the information in B above, if not recorded on the item or maintained in a separate log, should be maintained in the annual document log. Go to Record keeping Inspection Sheet, Module VIII)***

FACILITY NAME:
EPA ID NUMBER:

V. STORAGE FOR DISPOSAL §761.65 N/A

A. §761.65(b) Storage for Disposal Unit (SFDU) Requirements (*NOTE: **Conditions for PCB storage may differ for TSCA and RCRA or other alternative SFDUs)***

1. Does it have an adequate roof, walls and floor? NO ☐ YES ☐

2. Is the floor smooth and impervious (as defined in §761.3) with continuous 6" (minimum) curbing? NO ☐ YES ☐ *(NOTE: **a 6" curb not required for RCRA storage areas)***

3. Are any drain valves, floor drains, expansion joints, sewer lines or other openings that would permit escape of liquid from containment area? NO ☐ YES ☐

4. Is the containment volume adequate? NO ☐ YES ☐

(At least 2 times the internal volume of the largest PCB article/container or 25 percent of the total internal volume of all PCB articles or containers in storage. For RCRA units, 1times the internal volume of the largest or 10% of the total internal volume)

5. Is the SFDU above the 100-yr flood plain elevation? NO ☐ YES ☐

6. Is the SFDU marked with a 6x6 M_L label? NO ☐ YES ☐

B. PCB Storage N/A

1. Are any PCB's/ PCB Items stored within the SFDU? NO ☐ YES ☐

If yes: **Obtain an itemized inventory.**

2. Are items dated when they were taken out of service for disposal? NO ☐ YES ☐

3. Are items checked every 30 days for leaks? NO ☐ YES ☐

FACILITY NAME:
EPA ID NUMBER:

STORAGE FOR DISPOSAL (Continued)

4. Are leaks cleaned up immediately? NO ☐ YES ☐

5. Are PCB Transformers, PCB Containers, or PCB Capacitors marked with M_L? NO ☐ YES ☐

6. Are any PCB Items declared "for disposal" stored outside the SFDU? NO ☐ YES ☐

   If yes: is the applicable marking, 30 day temporary storage limit, reserve SFDU storage capacity, inspection frequency, SPCC plan requirements met? NO ☐ YES ☐

7. Are stationary tanks being used to store PCB items for disposal? NO ☐ YES ☐ (§761.65(c)(7))? If yes, go to Waste Oil Inspection Sheet, Module VII)

C. Commercial PCB Storage N/A

1. Are PCBs generated by others stored for disposal at this facility? NO ☐ YES ☐

2. If yes, does the facility have a TSCA PCB commercial disposal approval, TSCA interim status authorization, a RCRA Part B container storage permit, or is the facility a transfer facility storing PCB waste for ≤10 days? NO ☐ YES ☐

3. If the facility is a TSCA facility, is a copy of the current closure plan, closure cost estimate and financial assurance documentation available for review? NO ☐ YES ☐

4. If the facility has a commercial storage approval, **check storage inventory against maximum capacity limits and waste types approved for storage in written approval.**

FACILITY NAME:
EPA ID NUMBER:

VI. DISPOSAL & SPILLS (§761.60 & 761 Subpart G)

A. **Ever** dispose of any PCBs/Items? NO ☒ YES ☐ If so:

1. Liquids
   a. Quantity (gallons, kg, etc.)
   b. Date(s)
   c. Manifest #(s)
   d. Certificate(s) of Disposal

2. PCB Articles
   a. Type of equipment (tfs, regulators, circuit breakers, etc.) disposed
   b. Quantity / weight
   c. Date(s)
   d. Manifest #(s) (if no manifest, note who transported and who disposed)
   e. Certificate(s) of Disposal

3. PCB Containers
   a. Quantity
   b. Quantity / weight
   c. Date(s)
   d. Manifest #(s) (if no manifest, note who transported and who disposed)
   e. Certificate(s) of Disposal
   f. Decontamination

B. Each PCB disposal manifest since 2/5/90 should contain the following info:
1. EPA ID #
2. Identity of waste
3. Serial #/other means of ID if no serial # (not req. for bulk waste)
4. (Earliest) date out of service for disposal
5. Weight in kg for each Item disposed

FACILITY NAME:
EPA ID NUMBER:

DISPOSAL & SPILLS (Continued)

6. Note transporter and/or designated disposers:

Note: **disposal manifests and Certificates of Destruction are collectively called "annual records," and the requirements to keep them didn't begin until disposals made on or after 2/5/90**; therefore, if there have been any disposals since 2/5/90, do they have the required manifests and Certificates of Destruction? NO ☐ YES ☐

C. Ever have any PCB spills? NO ☐ YES ☐ If so:

1. Source
2. When
3. Quantity of PCB involved
4. Cleaned up per 761 Subpart G? NO ☐ YES ☐
   a. When
   b. By whom
   c. How debris disposed
5. Clean up report prepared? NO ☐ YES ☐
6. Post clean up test results OK? NO ☐ YES ☐

D. Ever have any fires involving PCBs/Items? NO ☐ YES ☐ (When, quantity, cleanup)

FACILITY NAME:
EPA ID NUMBER:

VII. WASTE OIL

A. Are **any** waste oils generated, used, or stored at the facility? NO ☐ YES ☐

B. What is the source of the waste oils? Routine equipment maintenance

C. Are waste oils tested for PCBs? NO ☐ YES ☐

D. Check class of oils generated, used or stored.

1. Waste oil containing 2 - 49 ppm PCBs N/A
2. Waste oil containing 50 - 499 ppm PCBs N/A
3. Waste oil containing > 500 ppm PCBs N/A

E. Are waste oils picked up by a recycler? NO ☐ YES ☒
Name of recycler? Southwest Land & Marine

F. Are waste oils burned at the facility? NO ☒ YES ☐

If yes:

1. Has facility notified EPA-RCRA as used oil burner? NO ☐ YES ☐
2. Is burner unit a "qualified incinerator" as defined under §761.3? NO ☐ YES ☐
Type of burner? _____

G. Have any PCB-contaminated waste oils (50-500ppm) been shipped to a commercial storage/disposal facility? NO ☒ YES ☐ N/A ~~Yes~~

H. Have any PCB-contaminated waste oils (50-500ppm) been sold for fuel or burned in a high efficiency boiler? NO ☒ YES ☐

I. Are bulk storage tanks used for waste oils containing < 50 ppm PCB? NO ☒ YES ☐

J. Is an SPCC plan available for < 50 ppm PCB bulk storage tanks? NO ☐ YES ☐ N/A

K. Are bulk storage tanks labeled? (**These tanks must be labeled if the PCB concentration is unknown or >50ppm.**) NO ☐ YES ☐ N/A

L. Are in-out records (date/amt.) available for bulk storage tanks? (§761.65(c)(8)) NO ☐ YES ☐ N/A

M. Have PCB fluids (>500 ppm) ever been added to bulk storage tanks? NO ☐ YES ☐ N/A

N. Have PCB-contaminated fluids (50-500 ppm) ever been added to <50 ppm PCB bulk storage tanks? NO ☐ YES ☐ N/A

FACILITY NAME:
EPA ID NUMBER:

VIV. RECORD KEEPING §761.180

A. Annual Documents N/A

Annual Document Logs should constitute single documents which include all of the required elements identified in § 761.180(a).
Annual Records constitute all signed manifests and all Certificates of Disposal received during the calendar year plus all records of inspection and cleanup performed in accordance with 761.65(c)(5) for the year.
Annual REPORTS are required to be submitted by a COMMERCIAL STORER ONLY by 7/15 and based on ADL & AR Records.

1. Are Annual Document Logs (ADL) and Annual Records (AR) available? NO ☐ YES ☐

2. Is ADL on calendar year basis? (§761.180(a) **1989 must cover 1/1/89 - 2/5/90 1990 must cover 2/6/90 - 12/31/90**) NO ☐ YES ☐

3. Are ADLs retained for 3 years? NO ☐ YES ☐

4. Does ADL list the unique manifest number for all shipments during the calendar year? (§761.180(a)(2)(ii)) NO ☐ YES ☐

5. Do ADLs list total number of PCB-Containers and the Total Weight in kg of the contents of PCB-Containers? NO ☐ YES ☐

6. Are PCB-Transformers removed from service and PCB Articles stored at the facility itemized in ADL? NO ☐ YES ☐

7. Is the Total Weight (kg) of PCB's contained in these transformers shown? NO ☐ YES ☐

8. Date Transformers removed from service? NO ☐ YES ☐

9. Date Transformers placed into transport for disposal? NO ☐ YES ☐

FACILITY NAME:
EPA ID NUMBER:

Record keeping (Continued)

10. Is the number of PCB-Transformers and the Total Weight (kg) of PCB's remaining in service at a calendar year end shown? NO ☐ YES ☐

11. Are PCB-Voltage Regulators recorded as PCB-Transformers? NO ☐ YES ☐

12. Are LHV/LLV PCB-Capacitors removed from service itemized? NO ☐ YES ☐

13. Date Capacitors removed from service? NO YES ☐

14. Date Capacitors placed into transport for disposal? NO ☐ YES ☐

15. Is the number of PCB LHV/LLV Capacitors remaining in service at calendar year end shown? NO ☐ YES ☐

16. Is the number of PCB-Containers in the SFDU area shown? NO ☐ YES ☐

17. Is the Weight (kg) of these PCBs also shown? NO ☐ YES ☐

18. Are the container contents identified? NO ☐ YES ☐

19. Are PCB-Items in containers listed? NO ☐ YES ☐

20. Date containers placed into storage? NO ☐ YES ☐

FACILITY NAME:
EPA ID NUMBER:

Record keeping (Continued)

21. Date containers placed into transport for disposal? NO ☐ YES ☐

22. Are PCB-Items distributed in commerce listed? NO ☐ YES ☐

23. Name, address, and phone number of receiving facility shown? NO ☐ YES ☐

24. Date of transfer shown? NO ☐ YES ☐

25. Serial number or internal ID number shown? NO ☐ YES ☐

26. Are names/locations of disposal/storage facilities for PCB shipments shown? NO ☐ YES ☐

CLOSING CONFERENCE:

Attendees: Mr. Wes Constable
Mr. Keith Hoelscher
Mr. Kelly Nash (Telephone)

Deficiencies:

No PCB reg. deficiencies observed at the time of inspection

Recommendations:

None.

"Receipt for Samples and Documents" signed?

United States Environmental Protection Agency
Washington, D.C. 20460
Toxic Substances Control Act

NOTICE OF INSPECTION

Form Approved
OMB No. 2070-0007
Approval Expires 07-31-96

1. Investigation Identification			2. Time	3. Firm Name
Date	Inspector No.	Daily Seq. No.		
3-24-03	TX-071	1	8:56 am	COMMERCIAL METALS COMPANY

4. Inspector Address	5. Firm Address
TEXAS DEPARTMENT OF HEALTH 1100 WEST 49TH ST AUSTIN, TX 78756	4614 AGNES ST. (HIGHWAY 44) CORPUS CHRISTI, TX 78405

REASON FOR INSPECTION

Under the authority of Section 11 of the Toxic Substances Control Act:

☒ For the purpose of inspecting (including taking samples, photographs, statements, and other inspection activities) an establishment, facility, or other premises in which chemical substances or mixtures or articles containing same are manufactured, processed or stored, or held before or after their distribution in commerce (including records, files, papers, processes, controls, and facilities) and any conveyance being used to transport chemical substances, mixtures, or articles containing same in connection with their distribution in commerce (including records, files, papers, processes, controls, and facilities) bearing on whether the requirements of the Act applicable to the chemical substances, mixtures, or articles within or associated with such premises or conveyance have been complied with.

☐ In addition, this inspection extends to *(Check appropriate blocks):*

- ☐ A. Financial data
- ☐ B. Sales data
- ☐ C. Pricing data
- ☐ D. Personnel data
- ☐ E. Research data

The nature and extent of inspection of such data specified in A through E above is as follows:

Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Inspector Signature		Recipient Signature	
		W. Constable	
Name		Name	
KEN OFUNREIN		W. CONSTABLE	
Title	Date Signed	Title	Date Signed
INSPECTOR	3-24-03	MRG	3/24/2003

EPA 7740-3 Rev (8-91)

*U.S. GPO: 1994-300-835/00257

US ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

TOXIC SUBSTANCES CONTROL ACT

TSCA INSPECTION CONFIDENTIALITY NOTICE

Form Approved
OMB No. 2070-0007
Expires 3-31-88

1. INVESTIGATION IDENTIFICATION		
DATE	INSPECTOR NO.	DAILY SEQ. NO.
3-24-03	TX-071	1

2. FIRM NAME
COMMERCIAL METALS COMPANY

3. INSPECTOR NAME
KEN OFUNREIN

4. FIRM ADDRESS
4614 AGNES ST. (HIGHWAY 44)
CORPUS CHRISTI, TX 78405

5. INSPECTOR ADDRESS
TEXAS DEPARTMENT OF HEALTH
1100 WEST 49TH STREET
AUSTIN, TX 78756

6. CHIEF EXECUTIVE OFFICER NAME
STAN RABIN

7. TITLE
CEO

TO ASSERT A CONFIDENTIAL BUSINESS INFORMATION CLAIM

It is possible that EPA will receive public requests for release of the information obtained during inspection of the facility above. Such requests will be handled by EPA in accordance with provisions of the Freedom of Information Act (FOIA), 5 USC 552; EPA regulations issued thereunder, 40 CFR Part 2; and the Toxic Substances Control Act (TSCA), Section 14. EPA is required to make inspection data available in response to FOIA requests unless the Administrator of the Agency determines that the data contain information entitled to confidential treatment or may be withheld from release under other exceptions of FOIA.

Any or all the information collected by EPA during the inspection may be claimed confidential if it relates to trade secrets or commercial or financial matters that you consider to be confidential business information. If you assert a CBI claim, EPA will disclose the information only to the extent, and by means of the procedures set forth in the regulations (cited above) governing EPA's treatment of confidential business information. Among other things, the regulations require that EPA notify you in advance of publicly disclosing any information you have claimed as confidential business information.

A confidential business information (CBI) claim may be asserted at any time. You may assert a CBI claim prior to, during, or after the information is collected. The declaration form was developed by the Agency to assist you in asserting a CBI claim. If it is more convenient for you to assert a CBI claim on your own stationery or by marking the individual documents or samples "TSCA confidential business information," it is not necessary for you to use this form. The inspector will be glad to answer any questions you may have regarding the Agency's CBI procedures.

While you may claim any collected information or sample as confidential business information, such claims are unlikely to be upheld if they are challenged unless the information meets the following criteria:

1. Your company has taken measures to protect the confidentiality of the information, and it intends to continue to take such measures.
2. The information is not, and has not been, reasonably obtainable without your company's consent by other persons (other than governmental bodies) by use of legitimate means (other than discovery based on showing of special need in a judicial or quasi-judicial proceeding).
3. The information is not publicly available elsewhere.
4. Disclosure of the information would cause substantial harm to your company's competitive position.

At the completion of the inspection, you will be given a receipt for all documents, samples, and other materials collected. At that time, you may make claims that some or all of the information is confidential business information.

If you are not authorized by your company to assert a CBI claim, this notice will be sent by certified mail, along with the receipt for documents, samples, and other materials to the Chief Executive Officer of your firm within 2 days of this date. The Chief Executive Officer must return a statement specifying any information which should receive confidential treatment.

The statement from the Chief Executive Officer should be addressed to: MS. LOU ROBERTS
U.S. EPA (6EN-AT)
1445 ROSS AVENUE, STE 1200
DALLAS, TX 75202-2733
and mailed by registered, return-receipt requested mail within 7 calendar days of receipt of this Notice. Claims may be made any time after the inspection, but inspection data will not be entered into the special security system for TSCA confidential business information until an official confidentiality claim is made. The data will be handled under the agency's routine security system unless and until a claim is made.

TO BE COMPLETED BY FACILITY OFFICIAL RECEIVING THIS NOTICE:

I have received and read the notice

SIGNATURE
W. Constable

NAME
W. CONSTABLE

TITLE
MRG

DATE SIGNED
3/24/2003

If there is no one on the premises of the facility who is authorized to make business confidentiality claims for the firm, a copy of this Notice and other inspection materials will be sent to the company's chief executive officer. If there is another company official who should also receive this information, please designate below.

NAME

TITLE

ADDRESS

US ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

TOXIC SUBSTANCES CONTROL ACT

RECEIPT FOR SAMPLES AND DOCUMENTS

1. INVESTIGATION IDENTIFICATION			2. COMPANY NAME
DATE	INSPECTION NO.	DAILY SEQ. NO.	
3-24-03	TX-071	1	COMMERCIAL METALS COMPANY

3. INSPECTOR ADDRESS	4. COMPANY ADDRESS
TEXAS DEPARTMENT OF HEALTH 1100 WEST 49TH STREET AUSTIN, TX 78756	4614 AGNES ST. (HIGHWAY 44) CORPUS CHRISTI, TX 78405

For internal EPA use. Copies of this form may be provided to recipient as acknowledgment of the documents and samples of chemical substances and/or mixture described below collected in connection with the administration and enforcement of the Toxic Substances Control Act.

RECEIPT OF DOCUMENT(S) AND/OR SAMPLE(S) DESCRIBED IS HEREBY ACKNOWLEDGED:

NO.	DESCRIPTION
(1)	Facility Floor plan
(2)	Commercial Metal company shredder residue monitoring for toxicity characteristic leaching procedure.
(3)	Commercial Metal Phase I Soil and ground water investigation done in April, 1997
(4)	CMC Corpus Christi annual production for 2000, 2001 and 2002.
(5)	Landfill tickets for CMC, Corpus Christi 1-23-03 to 1-24-03

OPTIONAL:

DUPLICATE OR SPLIT SAMPLES: REQUESTED AND PROVIDED ☐ NOT REQUESTED ☐

INSPECTOR SIGNATURE	CLAIMANT SIGNATURE
	W. Constable
NAME: KEN OFUNREIN	NAME: W. CONSTABLE
TITLE: INSPECTOR	DATE SIGNED: 3-24-03
TITLE: MRG.	DATE SIGNED: 3/24/03

EPA FORM 7740-1 (REVISED JULY 1996) CORE TSCA --- PREVIOUS VERSIONS ARE OBSOLETE

☆ U.S. GPO: 2001—617-481

FACILITY COPY

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region 6 Environmental Services Branch Laboratory

10625 Fallstone Road, Houston, TX 77099
Phone: (281)983-2100 Fax: (281)983-2248

Final Analytical Report

Site Name ---------- Commercial Metals - Corpus Christi

Sample Collection Date(s)-- 03/24/03

Contact ---------- Lou Roberts (6EN-AT)

Report Date ---------- 06/13/03

Work Order(s) ---------- 0303049

Analyses included in this report:

PCB 8082	Solids, Dry Weight

Report Narrative

The samples were analyzed 54 to 55 days after extraction. The recommended hold time for Method 8082 is 40 days.

The reporting limit (RL) for Aroclor 1260 was raised on sample 0303049-04 due to matrix interferences. Absence or presence at the lower RL could not be verified.

Standard procedures for quality assurance and quality control were followed in the analysis and reporting of the sample results. The results apply only to the samples tested. This final report should only be reproduced in full.

Reporting limits are adjusted for sample size and matrix interference.

Report Approval:

Richard McMillin
Region 6 Laboratory Manager

Environmental Protection Agency

Region 6 Laboratory

10625 Fallstone Road, Houston, TX 77099
Phone:(281)983-2100 Fax:(281)983-2248

ANALYTICAL REPORT FOR SAMPLES

Station ID	Laboratory ID	Matrix	Date Collected	Date Received
1	0303049-01	Solid	03/24/03	03/27/03 10:22
2	0303049-02	Solid	03/24/03	03/27/03 10:22
3	0303049-03	Solid	03/24/03	03/27/03 10:22
4	0303049-04	Solid	03/24/03	03/27/03 10:22
5	0303049-05	Solid	03/24/03	03/27/03 10:22
6	0303049-06	Solid	03/24/03	03/27/03 10:22
7	0303049-07	Solid	03/24/03	03/27/03 10:22
8	0303049-08	Solid	03/24/03	03/27/03 10:22

Region 6 Laboratory

10625 Fallstone Road, Houston, TX 77099
Phone:(281)983-2100 Fax:(281)983-2248

Aroclors by EPA Method 8082 - GC/ECD

Lab ID: 0303049-01 **Station ID: 1**

Batch: B3D0404 Date Collected: 03/24/03
Matrix: Solid Sample Volume: 1.134g Sample Qualifiers:

Analyte	Result µg/kg dry	Analyte Qualifiers	Reporting Limit	Dilution	Prepared	Analyzed
Aroclor-1016	U		394	1	04/03/03	05/27/03
Aroclor-1221	U		788	"	"	"
Aroclor-1232	U		394	"	"	"
Aroclor-1242	**3760**	6760 ug/kg	394	"	"	"
Aroclor-1248	U		394	"	"	"
Aroclor-1254	**1830**		394	"	"	"
Aroclor-1260	**1170**		394	"	"	"

Analyte	Result µg/kg dry	Analyte Qualifiers	%Recovery	%Recovery Limits	Prepared	Analyzed
Surr: Tetrachloro-meta-xylene	3020		61.3	11-113	"	"
Surr: Decachlorobiphenyl	3420		69.4	35-138	"	"
% Solids	**89.5**			1	03/31/03	04/01/03

Environmental Protection Agency

Region 6 Laboratory

10625 Fallstone Road, Houston, TX 77099
Phone:(281)983-2100 Fax:(281)983-2248

Aroclors by EPA Method 8082 - GC/ECD

Lab ID: 0303049-02 **Station ID: 2**

Batch:B3D0404 Date Collected: 03/24/03
Matrix: Solid Sample Volume: 1.159g Sample Qualifiers:

Analyte	Result µg/kg dry	Analyte Qualifiers	Reporting Limit	Dilution	Prepared	Analyzed
Aroclor-1016	U		404	1	04/03/03	05/27/03
Aroclor-1221	U		808	"	"	"
Aroclor-1232	U		404	"	"	"
Aroclor-1242	**46500**		4040	10	"	05/28/03
Aroclor-1248	U	48733 µg/kg	404	1	"	05/27/03
Aroclor-1254	**1510**		404	"	"	"
Aroclor-1260	**723**		404	"	"	"

Analyte	Result µg/kg dry	Analyte Qualifiers	%Recovery	%Recovery Limits	Prepared	Analyzed
Surr: Tetrachloro-meta-xylene	2970		58.8	11-113	"	"
Surr: Decachlorobiphenyl	3780		74.9	35-138	"	"
% Solids	**85.4**			1	03/31/03	04/01/03

Environmental Protection Agency

Region 6 Laboratory

10625 Fallstone Road, Houston, TX 77099
Phone:(281)983-2100 Fax:(281)983-2248

Aroclors by EPA Method 8082 - GC/ECD

Lab ID: 0303049-03 **Station ID: 3**

Batch:B3D0404 Date Collected: 03/24/03
Matrix: Solid Sample Volume: 2.305g Sample Qualifiers:

Analyte	Result µg/kg dry	Analyte Qualifiers	Reporting Limit	Dilution	Prepared	Analyzed
Aroclor-1016	U		211	1	04/03/03	05/27/03
Aroclor-1221	U		421	"	"	05/27/03
Aroclor-1232	U		211	"	"	"
Aroclor-1242	**12700**	36,940 ug/kg	1260	6	"	05/27/03
Aroclor-1248	U		211	1	"	05/27/03
Aroclor-1254	**19700**		1260	6	"	05/27/03
Aroclor-1260	**4540**		1260	"	"	"

Analyte	Result µg/kg dry	Analyte Qualifiers	%Recovery	%Recovery Limits	Prepared	Analyzed
Surr: Tetrachloro-meta-xylene	2680		102	11-113	"	"
Surr: Decachlorobiphenyl	2380		90.5	35-138	"	"
% Solids	**82.4**			1	03/31/03	04/01/03

Environmental Protection Agency

Region 6 Laboratory

10625 Fallstone Road, Houston, TX 77099
Phone:(281)983-2100 Fax:(281)983-2248

Aroclors by EPA Method 8082 - GC/ECD

Lab ID: 0303049-04 **Station ID: 4**

Batch:B3D0404 Date Collected: 03/24/03
Matrix: Solid Sample Volume: 2.148g Sample Qualifiers:

Analyte	Result µg/kg dry	Analyte Qualifiers	Reporting Limit	Dilution	Prepared	Analyzed
Aroclor-1016	U		208	1	04/03/03	05/27/03
Aroclor-1221	U		417	"	"	"
Aroclor-1232	U		208	"	"	"
Aroclor-1242	**1640**		208	"	"	"
Aroclor-1248	U		208	"	"	"
Aroclor-1254	U		208	"	"	"
Aroclor-1260	U		573	"	"	"

Analyte	Result µg/kg dry	Analyte Qualifiers	%Recovery	%Recovery Limits	Prepared	Analyzed
Surr: Tetrachloro-meta-xylene	2100		80.8	11-113	"	"
Surr: Decachlorobiphenyl	2030		78.1	35-138	"	"
% Solids	**89.4**			1	03/31/03	04/01/03

Environmental Protection Agency

Region 6 Laboratory

10625 Fallstone Road, Houston, TX 77099
Phone:(281)983-2100 Fax:(281)983-2248

Aroclors by EPA Method 8082 - GC/ECD

Lab ID: 0303049-05 **Station ID: 5**

Batch:B3D0404 Date Collected: 03/24/03
Matrix: Solid Sample Volume: 1.42g Sample Qualifiers:

Analyte	Result µg/kg dry	Analyte Qualifiers	Reporting Limit	Dilution	Prepared	Analyzed
Aroclor-1016	U		316	1	04/03/03	05/27/03
Aroclor-1221	U		631	"	"	05/27/03
Aroclor-1232	U		316	"	"	"
Aroclor-1242	**22700**		3160	10	"	05/27/03
Aroclor-1248	U	29,660 ug/kg	316	1	"	05/27/03
Aroclor-1254	**5830**		3160	10	"	05/27/03
Aroclor-1260	**1130**		316	1	"	05/27/03

Analyte	Result µg/kg dry	Analyte Qualifiers	%Recovery	%Recovery Limits	Prepared	Analyzed
Surr: Tetrachloro-meta-xylene	2830		71.6	11-113	"	"
Surr: Decachlorobiphenyl	3020		76.5	35-138	"	"
% Solids	**89.2**			1	03/31/03	04/01/03

Environmental Protection Agency

Region 6 Laboratory

10625 Fallstone Road, Houston, TX 77099
Phone:(281)983-2100 Fax:(281)983-2248

Aroclors by EPA Method 8082 - GC/ECD

Lab ID: 0303049-06 **Station ID: 6**

Batch:B3D0404 Date Collected: 03/24/03
Matrix: Solid Sample Volume: 1.27g Sample Qualifiers:

Analyte	Result µg/kg dry	Analyte Qualifiers	Reporting Limit	Dilution	Prepared	Analyzed
Aroclor-1016	U		348	1	04/03/03	05/27/03
Aroclor-1221	U		696	"	"	05/27/03
Aroclor-1232	U		348	"	"	"
Aroclor-1242	**46700**		3480	10	"	05/27/03
Aroclor-1248	U	47,940 mg/kg	348	1	"	05/27/03
Aroclor-1254	U		348	"	"	"
Aroclor-1260	**1240**		348	"	"	"

Analyte	Result µg/kg dry	Analyte Qualifiers	%Recovery	%Recovery Limits	Prepared	Analyzed
Surr: Tetrachloro-meta-xylene	3830		88.0	11-113	"	"
Surr: Decachlorobiphenyl	3430		78.9	35-138	"	"
% Solids	**90.4**			1	03/31/03	04/01/03

Environmental Protection Agency

Region 6 Laboratory

10625 Fallstone Road, Houston, TX 77099
Phone:(281)983-2100 Fax:(281)983-2248

Aroclors by EPA Method 8082 - GC/ECD

Lab ID: 0303049-07 **Station ID: 7**

Batch: B3D0404 Date Collected: 03/24/03
Matrix: Solid Sample Volume: 2.225g Sample Qualifiers:

Analyte	Result µg/kg dry	Analyte Qualifiers	Reporting Limit	Dilution	Prepared	Analyzed
Aroclor-1016	U		195	1	04/03/03	05/27/03
Aroclor-1221	U		390	"	"	"
Aroclor-1232	U		195	"	"	"
Aroclor-1242	**1190**		779	4	"	05/28/03
Aroclor-1248	U		195	1	"	05/27/03
Aroclor-1254	**1530**	3556	195	"	"	"
Aroclor-1260	**836**		195	"	"	"

Analyte	Result µg/kg dry	Analyte Qualifiers	%Recovery	%Recovery Limits	Prepared	Analyzed
Surr: Tetrachloro-meta-xylene	1920		78.7	11-113	"	"
Surr: Decachlorobiphenyl	2220		91.0	35-138	"	"
% Solids	**92.3**			1	03/31/03	04/01/03

Region 6 Laboratory

10625 Fallstone Road, Houston, TX 77099
Phone:(281)983-2100 Fax:(281)983-2248

Aroclors by EPA Method 8082 - GC/ECD

Lab ID: 0303049-08 **Station ID: 8**

Batch: B3D0404 Date Collected: 03/24/03
Matrix: Solid Sample Volume: 2.142g Sample Qualifiers:

Analyte	Result µg/kg dry	Analyte Qualifiers	Reporting Limit	Dilution	Prepared	Analyzed
Aroclor-1016	U		208	1	04/03/03	05/27/03
Aroclor-1221	U		417	"	"	"
Aroclor-1232	U		208	"	"	"
Aroclor-1242	**5870**		417	2	"	05/28/03
Aroclor-1248	U		208	1	"	05/27/03
Aroclor-1254	**2590**		208	"	"	"
Aroclor-1260	**1670**		208	"	"	"

Analyte	Result µg/kg dry	Analyte Qualifiers	%Recovery	%Recovery Limits	Prepared	Analyzed
Surr: Tetrachloro-meta-xylene	1780		68.5	11-113	"	"
Surr: Decachlorobiphenyl	1990		76.5	35-138	"	"
% Solids	**89.6**			1	03/31/03	04/01/03

Environmental Protection Agency

Region 6 Laboratory

10625 Fallstone Road, Houston, TX 77099
Phone:(281)983-2100 Fax:(281)983-2248

Aroclors by EPA Method 8082 - GC/ECD - Quality Control

Batch: B3D0404

Blank (B3D0404-BLK1)

Prepared: 04/03/03 Analyzed: 05/27/03

ANALYTE	Result µg/kg dry	Analyte Qualifiers	Reporting Limit	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit
Aroclor-1016	U		78.0						
Aroclor-1221	U		156						
Aroclor-1232	U		78.0						
Aroclor-1242	U		78.0						
Aroclor-1248	U		78.0						
Aroclor-1254	U		78.0						
Aroclor-1260	U		78.0						

ANALYTE	Result µg/kg dry	Analyte Qualifiers	Spike Level	%REC	%REC Limits
Surr: Tetrachloro-meta-xylene	1190		975	122 #	11-113
Surr: Decachlorobiphenyl	1250		975	128	35-138

LCS (B3D0404-BS1)

Prepared: 04/03/03 Analyzed: 05/27/03

ANALYTE	Result µg/kg dry	Analyte Qualifiers	Reporting Limit	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit
Aroclor-1242	1990		156	1950		102	70-130		

ANALYTE	Result µg/kg dry	Analyte Qualifiers	Spike Level	%REC	%REC Limits
Surr: Tetrachloro-meta-xylene	871		975	89.3	11-113
Surr: Decachlorobiphenyl	969		975	99.4	35-138

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Aroclors by EPA Method 8082 - GC/ECD - Quality Control

Batch: B3D0404

Matrix Spike (B3D0404-MS1)

Source: 0303049-07 Prepared: 04/03/03 Analyzed: 05/28/03

ANALYTE	Result µg/kg dry	Analyte Qualifiers	Reporting Limit	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit
Aroclor-1242	3780		780	4870	1190	53.2	50-150		

ANALYTE	Result µg/kg dry	Analyte Qualifiers	Spike Level	%REC	%REC Limits
Surr: Tetrachloro-meta-xylene	1350		2440	55.3	11-113
Surr: Decachlorobiphenyl	1910		2440	78.3	35-138

Matrix Spike Dup (B3D0404-MSD1)

Source: 0303049-07 Prepared: 04/03/03 Analyzed: 05/28/03

ANALYTE	Result µg/kg dry	Analyte Qualifiers	Reporting Limit	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit
Aroclor-1242	4510		832	5200	1190	63.8	50-150	18.1	25

ANALYTE	Result µg/kg dry	Analyte Qualifiers	Spike Level	%REC	%REC Limits
Surr: Tetrachloro-meta-xylene	1400		2600	53.8	11-113
Surr: Decachlorobiphenyl	1840		2600	70.8	35-138

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Notes and Definitions

R6A	This sample was extracted at a single acid pH.
R6T	The compounds listed are tentatively identified by the best match with the NIST or Wiley mass spectral data base or by manual interpretation. The concentrations are estimated based on a Response Factor of 1.0 to the nearest internal standard.
AES	Atomic Emission Spectrometer
CVAA	Cold Vapor Atomic Absorption
ECD	Electron Capture Detector
GC	Gas Chromatograph
GFAA	Graphite Furnace Atomic Absorption
ICP	Inductively Coupled Plasma
MS	Mass Spectrometer
NA	Not Applicable
NPD	Nitrogen Phosphorous Detector
NR	Not Reported
TCLP	Toxicity Characteristic Leaching Procedure
U	Undetected
#	Out of QC limits

The pH reported for Volatile liquid samples was tested using a 0-14 pH indicator strip for the purpose of verifying chemical preservation.

EPA
United States
Environmental Protection Agency
Region 6
1445 Ross Ave, Ste 1200
Dallas, Tx 75202-2733

http://www.epa.gov/region6
1-800-887-6063

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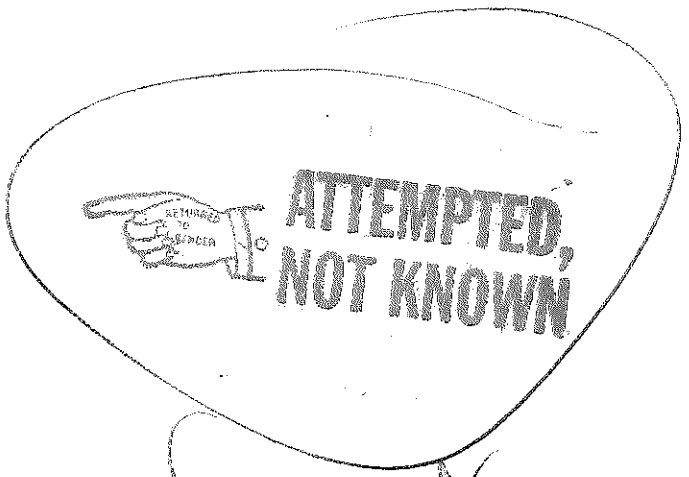

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Air/Toxics & Inspection
Coordination Branch
6EN-A

Mr. Wes Constable
Manager
Commercial Metals Company
4614 Agnes Street (Hwy 44)
Corpus Christi, TX 75405